

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	Chapter 11
	§	
KRISJENN RANCH, LLC, et al	§	Case No. 20-50805
	§	
Debtor	§	(Jointly Administered)

**FIRST INTERIM APPLICATION FOR PAYMENT OF ATTORNEY FEES BY
CJ MULLER & ASSOCIATES, PLLC, ATTORNEYS FOR
KRISJENN RANCH, LLC, KRISJENN RANCH LLC, SERIES UVALDE RANCH,
AND KRISJENN RANCH, LLC, SERIES PIPELINE ROW, DEBTORS-IN-
POSSESSION, FOR PROFESSIONAL SERVICES RENDERED FROM
APRIL 27, 2020 THROUGH DECEMBER 7, 2021**

**THIS APPLICATION REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR
INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE
GRANTED WITHOUT A HEARING BEING HELD. RESPONSES OR OBJECTIONS
MUST BE IN WRITING AND FILED WITH THE COURT IN ORDER TO SEEK A
HEARING ON THIS APPLICATION.**

1. CJ Muller & Associates, PLLC, (“Applicant”) has applied for professional compensation in the amount of \$150,096.38 in fees and \$18,174.07 in administrative expenses for a total amount requested of \$168,270.45.
2. The time period covered is April 27, 2020, through December 7, 2021.
3. The Applicant is the attorney for Debtors and Debtors-in-Possession KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row (collectively, the “Debtors”).
4. This is the first interim application.

5. The Applicant has not been granted fees and expenses post-petition.
6. The Applicant did not receive an original retainer.
7. The hourly rates charged for attorneys are \$325.00/hour for partners and senior attorneys, \$250/hour for junior attorneys, and \$120/hour for paralegals and law clerks.

Dated: December 9, 2021.

Respectfully Submitted,

CJ MULLER & ASSOCIATES, PLLC

By: /s/ John Muller
C. John Muller IV
State Bar No. 24070306
john.muller@cjma.law
Ezekiel J. Perez
State Bar No. 24096782
zeke.perez@cjma.law
111 W. Sunset Rd.
San Antonio, TX 78209
Telephone: 210-664-5000
Facsimile: 210-899-1933

ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Application for Payment of Attorney's Fees by CJ Muller & Associates, PLLC, Attorneys for Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row was forwarded to all parties listed on the attached Service List, by first class mail, postage prepaid, on December 10, 2021.

/s/ John Muller
C. John Muller IV

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	Chapter 11
KRISJENN RANCH, LLC, et al	§	
Debtors	§	Case No. 20-50805
	§	(Jointly Administered)

**FIRST INTERIM APPLICATION FOR PAYMENT OF ATTORNEY FEES BY
CJ MULLER & ASSOCIATES, PLLC, ATTORNEYS FOR KRISJENN
RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH,
AND KRISJENN RANCH, LLC-SERIES PIPELINE ROW
(COLLECTIVELY THE “DEBTORS”) RENDERED FROM
APRIL 27, 2020 THROUGH DECEMBER 7, 2021**

**THIS APPLICATION REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR
INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE
GRANTED WITHOUT A HEARING BEING HELD. RESPONSES OR OBJECTIONS
MUST BE IN WRITING AND FILED WITH THE COURT IN ORDER TO SEEK A
HEARING ON THIS APPLICATION.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW CJ Muller & Associates, PLLC f/k/a Muller Smeberg, PLLC (“Applicant”), attorneys for KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively the “Debtors”), pursuant to 11 U.S.C. §§ 503(b)(2), 507(a), and 331 as a priority administrative expense, and files its first interim fee application and respectfully shows as follows:

**I.
INTRODUCTION**

Applicant seeks payments from the bankruptcy estate—as an administrative expense—professional fees and expenses in the amount of \$168,270.45 for the time period April 27, 2020

through December 7, 2021 (“Compensation Period”).

II.
BANKRUPTCY RULE 2016 REQUIREMENTS

1. Applicant was appointed on April 27, 2020.

2. All professional services for which an allowance is requested were performed by Applicant for and on behalf of Debtors and not on behalf of any other person. This application seeks approval of fees of Applicant.

III.
FEES AND PAYMENT HISTORY

3. Applicant has applied for professional compensation in the amount of \$371,284.50 in fees and expenses.
4. The Applicant is the law firm representing KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row.
5. The time period covered is April 27, 2020 through December 7, 2021.
6. This is the final fee application for the period covered.
7. The hourly rates charged for attorneys are \$325.00 to \$350.00/hour for partners and senior attorneys, \$250.00/hour for associate attorneys, and \$120.00/hour for paralegals and law clerks.
8. The Applicant has received payments from Larry Wright in the amount of \$178,014.05, as follows:
- a. \$ 5,227.60 on September 1, 2020;
 - b. \$23,707.20 on October 1, 2020;
 - c. \$28,609.41 on October 30, 2020;
 - d. \$35,269.84 on November 30, 2020;
 - e. \$27,361.20 on January 18, 2021;
 - f. \$13,638.80 on January 18, 2021; and
 - g. \$44,200.00 on May 7, 2021.
9. Applicant has agreed to discount its fees in the amount of \$25,000.00

10. After applying the payments received and the discount, the balance owed on this fee application to be paid from Debtors' funds is \$168,270.45

IV.
JOHNSON FACTORS ANALYSIS

11. Applicant requests compensation based on the factors set forth in 11 U.S.C. § 330(a)(3) and *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974).

These factors include the following:

- a. *Time and Labor Required.* A description of the time and labor sorted by category of activity of Applicant appears in Exhibit A.
- b. *The Skill Required to Perform the Legal Services Provided.* Applicant represented Debtors in Adversary No. 20-05027 (the “Adversary”), which included the successful prosecution of a request for declaratory relief concerning a multi-million-dollar pipeline and right-of-way and successful defense of over thirty counterclaims alleging causes of action ranging from breach of contract to fraud. The issues presented were highly complex and required a high level of skill. Further, Applicant represents Debtors in connection with three appeals from the Adversary. Applicant also represents Debtors in connection with their objection to McLeod Oil, LLC’s proofs of claim, which involve the dispute over the validity of an amount in excess of \$700,000.00. Applicant has the necessary skills to successfully provide the services needed in these cases.
- c. *The Preclusion of Other Employment by the Attorney Due to Acceptance of the Case.* Applicant allocated a large amount of time and staffing to adequately prepare for and participate in the trial in this case; consequently, Applicant was required to refrain from rendering services in other matters.

- d. The Customary Fee. The compensation sought herein is comparable to the fees charged by other attorneys of comparable experience in the San Antonio, Texas market.
- e. Whether the Fee is Fixed or Contingent. The fee is fixed at \$325.00 to \$350.00 per hour for partners and senior attorneys, \$250.00 per hour for junior attorneys, and \$120.00 per hour for paralegals. This case was not taken on a contingent basis.
- f. Time Limitations by the Client or Other Circumstances. Applicant began representing Debtors at the inception of the Adversary Proceeding and had to, among other things: (1) propound and respond to a large volume of written discovery; (2) defend and take numerous depositions; (3) file and defend dispositive motions, including motions for summary judgment; (4) file numerous discovery motions; (4) prepare for trial; and (5) attend trial, all in less than eight months.
- g. The Experience, Reputation and Ability of the Attorneys. Applicant's primary attorney working on this case is C. John Muller IV. Mr. Muller has developed a reputation as a premier commercial litigator in the San Antonio, Texas market. Debtors selected John Muller based on his experience and knowledge in the field of civil litigation.
- h. The "Undesirability" of the Case. This case is not undesirable.
- i. Nature and Length of the Professional Relationship with the Client. Applicant was retained by Debtor for representation on April 27, 2020.
- j. Results Obtained. Applicant successfully prosecuted a request for declaratory

relief concerning a multi-million-dollar pipeline and right-of-way and successfully defended against more than thirty counterclaims alleging causes of action ranging from breach of contract to fraud and seeking tens of millions of dollars in damages.

- k. Awards in Similar Case. The amount requested is similar or less than what other attorneys of similar experience would charge in similar cases.
- l. Travel Time. Applicant did not bill for travel time.
- m. Other Factors. There are no other factors of particular importance to the fee request.

WHEREFORE PREMISES CONSIDERED, pursuant to 11 U.S.C. §§ 503(b)(2), 507(a), 331, the Applicant respectfully requests the approval of the Fee Application of CJ Muller & Associates for payment of professional fees in the amount of \$168,270.45 and for all other relief to which it may be justly entitled.

Dated: December 9, 2021.

Respectfully Submitted,

CJ MULLER & ASSOCIATES, PLLC

By: /s/ John Muller
C. John Muller IV
State Bar No. 24070306
john.muller@cjma.law
Ezekiel J. Perez
State Bar No. 24096782
zeke.perez@cjma.law
111 W. Sunset Rd.
San Antonio, TX 78209
Telephone: 210-664-5000
Facsimile: 210-899-1933

ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Application for Payment of Attorney's Fees by CJ Muller & Associates, PLLC, Attorneys for Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row was forwarded to all parties listed on the attached Service List, by first class mail, postage prepaid, on December 10, 2021.

/s/ John Muller
C. John Muller IV

EXHIBIT A
Adversary No. 20-05027

**GENERAL, MISCELLANEOUS LEGAL SERVICES
FOR PROFESSIONAL SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
664	7/24/2020	Craig O'Neil	Initial Review of DMA's motion for summary judgment.	0.5	\$ 250.00	\$ 125.00
664	7/30/2020	Craig O'Neil	Compile document lists for documents already produced under Rule 26(a)(1)(B). Draft Disclosures. Draft Exhibit A for attachment to disclosures.	1.5	\$ 250.00	\$ 375.00
699	8/3/2020	John Muller	Prepare for hearing on motion to quash subpoena and for protective order.	1.5	\$ 325.00	\$ 487.50
699	8/5/2020	Craig O'Neil	Motion for Summary Judgment Research on Sabine cases and their impact on our case.	1.8	\$ 250.00	\$ 450.00
699	8/10/2020	Sherry Barnash	Sit in on conference with J.Muller and client re case status and participate in conference re offers of judgment.	1	\$ 250.00	\$ 250.00
699	8/12/2020	Ezekiel Perez	Provide pertinent documents to C. O'Neil for proposed order draft; Confer with C. O'Neil about the same; Provide filed document to C. O'Neil.	0.6	\$ 250.00	\$ 150.00
699	8/13/2020	Craig O'Neil	Negotiate terms of continuances and deadline extensions with opposing counsel. Provide J. Muller R. Smeberg and W. Germany privy of progress.	0.8	\$ 250.00	\$ 200.00
699	8/17/2020	Craig O'Neil	Conduct Third Party Beneficiary research and its implications on pleadings.	0.5	\$ 250.00	\$ 125.00
699	8/18/2020	Craig O'Neil	Locate George Harrison Pigg's contact information and call to inquire about Deposition availability.	0.3	\$ 250.00	\$ 75.00

699	8/19/2020	Craig O'Neil	Compile letter discovery documents amended pleadings and motion to continue for J. Muller's review.	0.2	\$ 250.00	\$ 50.00
699	8/19/2020	Craig O'Neil	Compile PDFs of Motions to continue Motions to Amend Motions to Expedite Discovery Requests and Conference Letters and send all 12 documents to opposing counsel.	0.6	\$ 250.00	\$ 150.00
699	8/19/2020	Craig O'Neil	Order for Motion to Continue Motion for Partial Summary Judgment on Bigfoot.	0.4	\$ 250.00	\$ 100.00
699	8/21/2020	Craig O'Neil	Follow up with D. Anguiano re: Notice of Expedited hearing.	0.1	\$ 250.00	\$ 25.00
699	8/24/2020	John Muller	Prepare for Motion for Continuance regarding DMA/Moore's Motion for Partial Summary Judgment regarding Big Foot Note.	1.8	\$ 325.00	\$ 585.00
699	8/25/2020	Craig O'Neil	Preparation for hearing on Motion to Continue DMA Motion for Partial Summary Judgment on Bigfoot Note Payment.	0.3	\$ 250.00	\$ 75.00
699	8/25/2020	Ezekiel Perez	Assisted J. Muller with hearing preparation.	0.2	\$ 250.00	\$ 50.00
750	9/14/2020	Bryan Lopez	Attention to real estate issues regarding successor in interest matter and other real estate items	0.8	\$ 325.00	\$ 260.00
750	9/14/2020	Craig O'Neil	Compile Motion for Partial Summary Judgment exhibits and send Response and exhibits to D. Anguiano for filing.	0.6	\$ 250.00	\$ 150.00
750	9/15/2020	Paige Burrough	C. O'Neil call; Print Motion for Summary Judgment cases.	0.5	\$ 225.00	\$ 112.50
750	9/21/2020	John Muller	Prepare for Motion for Partial Summary Judgment hearing regarding interpretation of	3.2	\$ 325.00	\$ 1,040.00

			DMA Agreement			
750	9/21/2020	Craig O'Neil	Prepare for Motion for Partial Summary Judgment hearing regarding interpretation of DMA Agreement with J. Muller.	5	\$ 250.00	\$ 1,250.00
750	9/22/2020	John Muller	Prepare for Motion for Partial Summary Judgment hearing regarding interpretation of DMA Agreement	2.8	\$ 325.00	\$ 910.00
750	9/22/2020	Craig O'Neil	Prepare for Motion for Partial Summary Judgment hearing with J. Muller.	2	\$ 250.00	\$ 500.00
750	9/25/2020	Ezekiel Perez	Completed draft of conference letter regarding DMA and Moore's responses to Debtors' five sets of written discovery.	1.2	\$ 250.00	\$ 300.00
750	9/28/2020	Ezekiel Perez	Assisted F. Payne with production of documents.	0.4	\$ 250.00	\$ 100.00
750	9/29/2020	John Muller	Prepare and attend deposition of Larry Wright.	8	\$ 325.00	\$ 2,600.00
750	9/29/2020	Ezekiel Perez	Assisted with deposition set-up and conferred with W. Germany regarding the same.	0.2	\$ 250.00	\$ 50.00
750	9/29/2020	Ezekiel Perez	Assisted with deposition tech and document issues.	0.3	\$ 250.00	\$ 75.00
750	9/30/2020	John Muller	Prepare and attend deposition of Larry Wright.	8	\$ 325.00	\$ 2,600.00
750	9/30/2020	Ezekiel Perez	Document review for exhibits; conferred with J. Muller and W. Germany regarding the same.	1.6	\$ 250.00	\$ 400.00
800	10/6/2020	Craig O'Neil	Compile exhibits and send final Motion for Partial Summary Judgment Response with exhibits to Denielle for filing.	0.8	\$ 250.00	\$ 200.00
800	10/13/2020	Craig O'Neil	Preparation for hearing on Bigfoot Note Motion for Summary Judgment with J. Muller.	2	\$ 250.00	\$ 500.00

800	10/14/2020	Ezekiel Perez	Continued document review and draft of motion to compel.	4.9	\$ 250.00	\$ 1,225.00
800	10/19/2020	Ezekiel Perez	Prepared proposed final draft of motion to compel conferred with J. Muller finalized proposed edits to motion to compel served cover letter with motion on opposing counsel.	2.1	\$ 250.00	\$ 525.00
800	10/20/2020	Ezekiel Perez	Worked with F. Payne on responsive document organization; conferred with W. Germany regarding responsive email production.	0.4	\$ 250.00	\$ 100.00
800	10/21/2020	Ezekiel Perez	Provided proposed edits to Motion for Expedited consideration of motion to compel.	0.2	\$ 250.00	\$ 50.00
800	10/22/2020	Ezekiel Perez	Document review in preparation of production; conferred with F. Payne regarding the same.	2.3	\$ 250.00	\$ 575.00
800	10/23/2020	Craig O'Neil	Outlining and drafting shell of Motion for Partial Summary Judgment on Moore's claims.	2	\$ 250.00	\$ 500.00
800	10/27/2020	Ezekiel Perez	Assist J. Muller and A. Tiwari with document drafting and provided pertinent supporting documents.	0.7	\$ 250.00	\$ 175.00
800	10/27/2020	Ezekiel Perez	Continued conference with A. Tiwari and J. Muller regarding draft settlement agreement.	1.2	\$ 250.00	\$ 300.00
830	11/1/2020	Ezekiel Perez	Prepare for pending hearing regarding amended pleadings and case scheduling.	0.2	\$ 250.00	\$ 50.00
830	11/2/2020	Ezekiel Perez	Prepare exhibits for hearing on Motion to Compel; Confer with J. Muller regarding the same.	1.7	\$ 250.00	\$ 425.00
830	11/2/2020	John Muller	Prepare for Motion to Compel.	1	\$ 325.00	\$ 325.00

830	11/2/2020	Ezekiel Perez	Prepare timeline and identify potential exhibits for depositions/trials.	0.2	\$ 250.00	\$ 50.00
830	11/2/2020	Ezekiel Perez	Prepared for and attended hearing on Motion to Compel.	1.9	\$ 250.00	\$ 475.00
830	11/2/2020	Ezekiel Perez	Prepared proposed Order on Motion to Compel; Sent draft to T. Cleveland for review.	0.7	\$ 250.00	\$ 175.00
830	11/3/2020	Craig O'Neil	Continue to review Counter-Plaintiff's disclosures and analyze alleged damages and calculation of same.	0.2	\$ 250.00	\$ 50.00
830	11/4/2020	Craig O'Neil	Prepare Summary Judgment Evidence.	0.3	\$ 250.00	\$ 75.00
830	11/4/2020	Ezekiel Perez	Verified that corrected amended complaint was filed with Court.	0.4	\$ 250.00	\$ 100.00
830	11/10/2020	John Muller	Prepare power point presentation and exhibits for trial.	3.6	\$ 325.00	\$ 1,170.00
830	11/11/2020	Ezekiel Perez	Made changes to proposed deposition notices.	0.3	\$ 250.00	\$ 75.00
830	11/12/2020	Ezekiel Perez	Prepare for hearing on objections to amended complaints.	0.7	\$ 250.00	\$ 175.00
830	11/14/2020	Ezekiel Perez	Continued review of L. Wright's second day of deposition testimony.	0.7	\$ 250.00	\$ 175.00
830	11/15/2020	Ezekiel Perez	Continued to review second day of L. Wright's deposition testimony.	1.1	\$ 250.00	\$ 275.00
830	11/19/2020	Craig O'Neil	Prepare Response to Motion to Dismiss.	0.3	\$ 250.00	\$ 75.00
830	11/24/2020	Craig O'Neil	Prepare dispositive motions task list for hearing on Dec. 7.	0.3	\$ 250.00	\$ 75.00
841	12/3/2020	Ezekiel Perez	Prepare deposition exhibits/review production. Finalize set of key documents for deposition.	9.5	\$ 250.00	\$ 2,375.00
841	12/3/2020	John Muller	Continued correspondence with W. Shelton's offices regarding scheduling of mediation.	0.3	\$ 325.00	\$ 97.50

841	12/7/2020	Ezekiel Perez	Prepare for and attend hearing on Motion for Partial Summary Judgment and 12(b)(6) motion to dismiss.	2.7	\$ 250.00	\$ 675.00
841	12/7/2020	John Muller	Prepare to argue Motions for Summary Judgment	4.2	\$ 325.00	\$ 1,365.00
841	12/7/2020	Ezekiel Perez	Mediation questionnaire preparation.	0.3	\$ 250.00	\$ 75.00
841	12/10/2020	Ezekiel Perez	Update draft of First Amended Disclosures and send to J. Muller for review.	0.6	\$ 250.00	\$ 150.00
841	12/16/2020	Ezekiel Perez	Prepare for deposition of D. Borders; Correspondence with court reporter.	0.6	\$ 250.00	\$ 150.00
841	12/21/2020	Ezekiel Perez	Document review and prepared witness and exhibit list for motion to compel; Prepare presentation for judge regarding relevancy of messages.	6.7	\$ 250.00	\$ 1,675.00
841	12/22/2020	Ezekiel Perez	Prepared for and attended hearing on motion to compel.	1.3	\$ 250.00	\$ 325.00
841	12/23/2020	Ezekiel Perez	Continue draft of motion for leave to amend.	1.7	\$ 250.00	\$ 425.00
841	12/31/2020	Ezekiel Perez	Continue exhibit preparation and document review.	4.3	\$ 250.00	\$ 1,075.00
841	12/31/2020	Ezekiel Perez	Exhibit preparation for trial.	2.5	\$ 250.00	\$ 625.00
925	1/3/2021	Ezekiel Perez	Continued revised draft of proposed pretrial order; Review TCRG production for exhibits.	8.7	\$ 250.00	\$ 2,175.00
925	1/5/2021	Sherry Barnash	Follow up on proposed Findings of Facts and Conclusions of Law with E. Perez	0.1	\$ 250.00	\$ 25.00

925	1/6/2021	Ezekiel Perez	Assist with preparation for deposition of D. Moore; Research caselaw and draft proposed conclusions of law; Confer with A. Krist and T. Cleveland regarding outstanding pretrial issues; Confer with W. Germany regarding Wright's affirmative defenses; Edit draft of motion for leave to file Findings of Facts and Conclusions of Law; Edit draft of Order on the same; Finalize Findings of Facts and Conclusions of Law Motion for Leave and Order; Edit and finalize proposed privilege log; Edit and finalize Rule 26 Disclosures; File motion on ECF; Serve copies of all filings to all counsel of record; Review DMA Moore Longbranch Exhibits.	10.3	\$ 250.00	\$ 2,575.00
925	1/6/2021	Sherry Barnash	Mark A. McLeod deposition excerpts designated by opposing counsel.	1	\$ 250.00	\$ 250.00
925	1/10/2021	Ezekiel Perez	Trial preparation.	5.6	\$ 250.00	\$ 1,400.00
925	1/11/2021	Ezekiel Perez	Prepare for and attend trial. Confer with client regarding the same.	9.4	\$ 250.00	\$ 2,350.00
925	1/12/2021	Ezekiel Perez	Prepare for day two of trial; Attend trial; Prepare for day three.	9.6	\$ 250.00	\$ 2,400.00
925	1/13/2021	Ezekiel Perez	Prepare for and participate in day 3 of trial.	9.2	\$ 250.00	\$ 2,300.00
925	1/14/2021	Ezekiel Perez	Closing preparation and preparation for cross of D. Moore.	10.8	\$ 250.00	\$ 2,700.00
925	1/15/2021	Ezekiel Perez	Prepare for and attend day four of trial.	8.7	\$ 250.00	\$ 2,175.00
925	1/20/2021	Ezekiel Perez	Continued preparations for closing; Confer with W. Germany regarding	5.1	\$ 250.00	\$ 1,275.00

			trial preparations; Finalize PowerPoint presentation.			
925	1/21/2021	Ezekiel Perez	Prepare for and participate in trial.	4.9	\$ 250.00	\$ 1,225.00
925	1/25/2021	Ezekiel Perez	Prepare for closing of trial; Confer with client opposing counsel W. Germany and the Court regarding covid outbreak; Sought reset of trial; Communicate the same to J. Muller.	2.1	\$ 250.00	\$ 525.00
925	2/11/2021	Ezekiel Perez	Prepare for and attend last day of trial.	5	\$ 250.00	\$ 1,250.00
925	2/11/2021	John Muller	Prepare for and attend trial.	5	\$ 325.00	\$ 1,625.00
1089	4/12/2021	Bryan Lopez	Confer with client and John Muller regarding option issue as part of sale of pipeline easement and review documents relating to the same.	1.5	\$325.00	\$487.50
1216	08/03/2021	Ezekiel Perez	Prepare outline for hearing on Attorney's fees. Confer with J. Muller regarding the same	4.1	\$250.00	\$ 1,025.00
1216	08/04/2021	Ezekiel Perez	Prepare for and attend hearing; confer with client regarding path forward; review correspondence from T. Cleveland; draft and sent response to B. Kuhlman.	3.5	\$250.00	\$ 875.00
					Total:	\$57,165.00

Timekeeper Summary

Name	Hours	Rate	Amount
John Muller	39.4	\$325/Hour	\$ 12,805.00
Bryan Lopez	0.8	\$325/Hour	\$ 747.50
Ezekiel Perez	143.8	\$250/Hour	\$ 37,850.00
Craig O'Neil	20.5	\$250/Hour	\$ 5,125.00
Sherry Barnash	2.1	\$250/Hour	\$ 525.00
Paige Burrough	0.5	\$250/Hour	\$ 112.50

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$ 57,165.00

**TRIAL AND HEARINGS
FOR PROFESSIONAL SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
699	8/3/2020	John Muller	Attend hearing on motion to quash and for protective order.	0.5	\$ 325.00	\$ 162.50
699	8/3/2020	Ezekiel Perez	Attend hearing.	0.6	\$ 250.00	\$ 150.00
699	8/25/2020	Craig O'Neil	Hearing on Motion to Continue DMA Motion for Partial Summary Judgment on Bigfoot Note Payment.	1	\$ 250.00	\$ 250.00
699	8/25/2020	John Muller	Attend hearing on Motion for Continuance.	1	\$ 325.00	\$ 325.00
750	9/22/2020	Ezekiel Perez	Participate in hearing on Motion for Summary Judgment and Objections to subpoena.	2.1	\$ 250.00	\$ 525.00
750	9/22/2020	Craig O'Neil	Participate in Motion for Partial Summary Judgment hearing regarding interpretation of DMA agreement.	2	\$ 250.00	\$ 500.00
750	9/22/2020	John Muller	Attend Motion for Partial Summary Judgment hearing regarding interpretation of DMA agreement.	2	\$ 325.00	\$ 650.00
750	9/24/2020	Paige Burrough	Attend KrisJenn discovery strategy meeting	0.3	\$ 225.00	\$ 67.50
800	10/8/2020	Ezekiel Perez	Participated in deposition of A. McLeod; conferred with J. Muller regarding the same.	7.4	\$ 250.00	\$ 1,850.00
800	10/9/2020	John Muller	Attend John Mcleod deposition.	3	\$ 325.00	\$ 975.00
800	10/13/2020	Craig O'Neil	Hearing on Bigfoot Note Motion for Summary Judgment.	2	\$ 250.00	\$ 500.00
830	11/2/2020	John Muller	Attend Motion to Compel Discovery Responses	0.8	\$ 325.00	\$ 260.00
830	11/3/2020	Ezekiel Perez	Attend conference regarding Motion to Continue.	0.7	\$ 250.00	\$ 175.00

830	11/12/2020	John Muller	Attend hearing on motion for leave to amend pleadings.	1	\$ 325.00	\$ 325.00
841	12/4/2020	John Muller	Take deposition of Daniel Moore.	8.8	\$ 325.00	\$ 2,860.00
841	12/4/2020	Ezekiel Perez	Attend deposition of F. Moore.	10.8	\$ 250.00	\$ 2,700.00
841	12/7/2020	John Muller	Argue Motions for Summary Judgment.	0.8	\$ 325.00	\$ 260.00
841	12/8/2020	Ezekiel Perez	Participate in mediation.	2.2	\$ 250.00	\$ 550.00
841	12/8/2020	John Muller	Attend Mediation.	8.5	\$ 325.00	\$ 2,762.50
841	12/16/2020	Ezekiel Perez	Attend and assist with deposition of Darrin Borders.	3.4	\$ 250.00	\$ 850.00
925	1/2/2021	Ezekiel Perez	Trial preparation.	5.3	\$ 250.00	\$ 1,325.00
925	1/4/2021	John Muller	Trial preparation.	8.1	\$ 325.00	\$ 2,632.50
925	1/5/2021	John Muller	Trial preparation.	7.7	\$ 325.00	\$ 2,502.50
925	1/6/2021	John Muller	Trial preparation.	9.1	\$ 325.00	\$ 2,957.50
925	1/7/2021	John Muller	Trial preparation.	8.4	\$ 325.00	\$ 2,730.00
925	1/8/2021	John Muller	Trial preparation.	6.9	\$ 325.00	\$ 2,242.50
925	1/8/2021	Ezekiel Perez	Trial preparation; Final draft/edits to proposed pretrial order and findings of fact and conclusions of law; Approved final exhibits; Multiple correspondence with opposing counsel; Confer with client; Finalize drafts and file via ECF; corresponded with D. Castleberry.	9.2	\$ 250.00	\$ 2,300.00
925	1/9/2021	Ezekiel Perez	Trial preparation.	8.8	\$ 250.00	\$ 2,200.00
925	1/11/2021	John Muller	Attendance at Trial	7.3	\$ 325.00	\$ 2,372.50

925	1/12/2021	John Muller	Attendance at Trial.	8.6	\$ 325.00	\$ 2,795.00
925	1/13/2021	John Muller	Attendance at Trial.	8.1	\$ 325.00	\$ 2,632.50
925	1/14/2021	John Muller	Trial Preparation.	8.2	\$ 325.00	\$ 2,665.00
925	1/15/2021	John Muller	Attendance at Trial.	7.8	\$ 325.00	\$ 2,535.00
925	2/10/2021	Ezekiel Perez	Trial preparations including edits to closing presentation.	5.8	\$ 250.00	\$ 1,450.00
1216	08/04/2021	John Muller	Attend Hearing for Attorney's fees.	1.0	\$ 325.00	\$ 325.00
					TOTAL:	\$50,362.50

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Muller	106.9	\$325/Hour	\$ 33,995.00
Ezekiel Perez	59.3	\$250/Hour	\$ 15,050.00
Craig O'Neil	5.0	\$250/Hour	\$ 1,250.00
Paige Burrough	.3	\$225/Hour	\$ 67.50

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$50,362.50

**DRAFTS AND DISCOVERY
FOR PROFESSIONAL SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
664	7/17/2020	Ezekiel Perez	Draft memo regarding potential third party adversary claims.	0.6	\$ 250.00	\$ 150.00
664	7/29/2020	Craig O'Neil	Draft Rule 26 disclosures and send to R. Smeberg for review. Discuss documents that were already produced with E. Perez.	0.4	\$ 250.00	\$ 100.00
664	7/30/2020	Craig O'Neil	Draft disclosures. Send email to Larry Wright regarding John Terril information. Send email to J. Muller regarding insurance question.	0.7	\$ 250.00	\$ 175.00
664	7/30/2020	Craig O'Neil	Draft version 1 of conference letter to Boerner Dennis & Franklin PLLC.	2	\$ 250.00	\$ 500.00
64	7/31/2020	Craig O'Neil	Draft conference letter; Gather email information from recipient and discuss motion for continuance with R. Smeberg. Call J. Muller re: motion for continuance and leave a voicemail.	0.5	\$ 250.00	\$ 125.00
699	8/5/2020	Craig O'Neil	Finalize review of Covenants that run with the land and annotate harmful and helpful propositions throughout the article and send article to the group for review.	2.6	\$ 250.00	\$ 650.00

699	8/6/2020	Craig O'Neil	Draft email to group outlining arguments and concerns with touch and concern and privity of estate for Motion for Summary Judgment.	0.5	\$ 250.00	\$ 125.00
699	8/11/2020	Craig O'Neil	Draft Response to Motion for Summary Judgment.	3	\$ 250.00	\$ 750.00
699	8/12/2020	John Muller	Draft Interrogatories and Requests for Production to Daniel Moore.	5.7	\$ 325.00	\$ 1,852.50
699	8/12/2020	Craig O'Neil	Draft Motion for Partial Summary Judgment response.	1	\$ 250.00	\$ 250.00
800	8/12/2020	Sherry Barnash	Draft of Status Report re Offer of Judgment.	0.8	\$ 250.00	\$ 187.50
699	8/12/2020	Craig O'Neil	Draft Order on expedited motion to continue Motion for Summary Judgment Deadline to Respond to Motion for Summary Judgment and Deadline to submit David Stolle Privilege Log.	0.5	\$ 250.00	\$ 125.00
699	8/13/2020	John Muller	Draft Interrogatories and Requests for Production to Daniel Moore.	1.7	\$ 325.00	\$ 552.50
699	8/13/2020	Craig O'Neil	Draft Proposed Agreed Order reflecting negotiated terms and send to opposing counsel for review.	1.2	\$ 250.00	\$ 300.00

699	8/17/2020	Ezekiel Perez	Draft amended complaint.	0.5	\$ 250.00	\$ 125.00
699	8/17/2020	Ezekiel Perez	Draft first amended answer to Moore's counterclaim.	0.9	\$ 250.00	\$ 225.00
699	8/17/2020	Ezekiel Perez	Draft motion for leave to amend.	0.5	\$ 250.00	\$ 125.00
699	8/17/2020	Craig O'Neil	Draft written discovery requests and interrogatories to DMA.	1.2	\$ 250.00	\$ 300.00
699	8/17/2020	Ezekiel Perez	Begin draft first amended answer to DMA's counterclaim.	0.6	\$ 250.00	\$ 150.00
699	8/17/2020	Ezekiel Perez	Begin draft first amended answer to DMA's counterclaim.	0.9	\$ 250.00	\$ 225.00
699	8/18/2020	Craig O'Neil	Draft Conference Letter Re: DMA's objections to KrisJenn's First set of Requests for Production and availability dates for Frank Daniel Moore to be deposed.	0.8	\$ 250.00	\$ 200.00
699	8/18/2020	Craig O'Neil	Draft conference letter to Tim Cleveland.	0.2	\$ 250.00	\$ 50.00
699	8/18/2020	Ezekiel Perez	Draft discovery requests to Moore.	2.2	\$ 250.00	\$ 550.00
699	8/18/2020	Craig O'Neil	Draft Rule 56(d) motion.	1	\$ 250.00	\$ 250.00
699	8/18/2020	Craig O'Neil	Draft transmittal cover letter regarding discovery and pleadings.	0.6	\$ 250.00	\$ 150.00
699	8/18/2020	Craig O'Neil	Draft transmittal letter.	0.1	\$ 250.00	\$ 25.00
699	8/18/2020	Ezekiel Perez	Finalize Amended Complaint and Answers.	0.9	\$ 250.00	\$ 225.00

699	8/18/2020	Ezekiel Perez	Finalize Motion for leave to amend.	0.8	\$ 250.00	\$ 200.00
699	8/19/2020	Craig O'Neil	Draft 1st Interrogatories to DMA.	0.6	\$ 250.00	\$ 150.00
699	8/19/2020	Craig O'Neil	Draft 1st Interrogatories to Moore.	0.6	\$ 250.00	\$ 150.00
699	8/19/2020	Craig O'Neil	Draft 1st Requests for Production to Moore.	0.3	\$ 250.00	\$ 75.00
699	8/19/2020	Craig O'Neil	Draft 2nd Requests for Production to DMA.	0.6	\$ 250.00	\$ 150.00
699	8/19/2020	Craig O'Neil	Draft 2nd Requests for Production to Moore.	0.4	\$ 250.00	\$ 100.00
699	8/19/2020	Ezekiel Perez	Draft and edit proposed discovery and pleadings	1.6	\$ 250.00	\$ 400.00
699	8/19/2020	Craig O'Neil	Draft edits into Deposition letter re: Moore.	0.2	\$ 250.00	\$ 50.00
699	8/19/2020	Ezekiel Perez	finalize motion for leave and request filing of the same	1.1	\$ 250.00	\$ 275.00
699	8/20/2020	Craig O'Neil	Finalize Motion to Continue for filing and send to D. Anguiano to file with the Court.	0.4	\$ 250.00	\$ 100.00
699	8/21/2020	Craig O'Neil	Draft Subpoena to take George Harrison Pigg's deposition.	0.4	\$ 250.00	\$ 100.00
699	8/24/2020	Craig O'Neil	Draft Notice of Depositions and assemble the Notice of Depositions and Subpoena for version 2 review. Send version 2 for review to E. Perez.	0.6	\$ 250.00	\$ 150.00
699	8/24/2020	Craig O'Neil	Finalize verification on Motion to Continue and prepare for D.	0.4	\$ 250.00	\$ 100.00

			Anguiano to file with court.			
750	9/4/2020	Ezekiel Perez	Draft correspondence to D. Stolle regarding complying with court's request for privilege log.	0.4	\$ 250.00	\$ 100.00
800	9/9/2020	Craig O'Neil	Draft Motion for Summary Judgment response. Privity of Estate argument.	3	\$ 250.00	\$ 750.00
750	9/9/2020	Craig O'Neil	Draft Motion for Summary Judgment response. Privity of estate arguments.	8.4	\$ 250.00	\$ 2,100.00
750	9/11/2020	Craig O'Neil	Draft Contract arguments for Motion for Partial Summary Judgment run with the land response.	4.2	\$ 250.00	\$ 1,050.00
750	9/11/2020	Craig O'Neil	Draft Fact Pattern and Background portion of Motion for Partial Summary Judgment run with the land response.	4.1	\$ 250.00	\$ 1,025.00
750	9/12/2020	Craig O'Neil	Draft intent arguments for run with the land Motion for Partial Summary Judgment response.	2	\$ 250.00	\$ 500.00
750	9/14/2020	Ezekiel Perez	Draft affidavit of Larry Wright for Response to Summary Judgment.	1.1	\$ 250.00	\$ 275.00
750	9/14/2020	Craig O'Neil	Finalize run with the land Motion for Partial Summary	1.4	\$ 250.00	\$ 350.00

			Judgment response and exhibits.			
750	9/14/2020	Craig O'Neil	Finish draft of run with the land Motion for Partial Summary Judgment response.	9.1	\$ 250.00	\$ 2,275.00
750	9/15/2020	Ezekiel Perez	Draft of notice of intent to depose corporate rep of DMA.	0.3	\$ 250.00	\$ 75.00
750	9/15/2020	Ezekiel Perez	Drafted notice of intent to take deposition of F. D. Moore; Sent draft to C. O'Neil for review.	0.8	\$ 250.00	\$ 200.00
750	9/16/2020	Ezekiel Perez	Draft deposition notice for DMA Properties Inc.'s corporate representative and conferred with J. Muller regarding topics.	0.6	\$ 250.00	\$ 150.00
750	9/16/2020	Ezekiel Perez	Draft notice of intent to serve subpoena and subpoena for the deposition of SCMED.	0.7	\$ 250.00	\$ 175.00
750	9/16/2020	Ezekiel Perez	Edited proposed order and requested filing.	0.2	\$ 250.00	\$ 50.00
750	9/22/2020	Ezekiel Perez	Draft proposed order on objections to subpoena requests; conferred with C. O'Neil and J. Muller regarding the same.	0.6	\$ 250.00	\$ 150.00
750	9/23/2020	Ezekiel Perez	Finalize conference letter; served the same on all counsel of record.	0.2	\$ 250.00	\$ 50.00
750	9/28/2020	Ezekiel Perez	Drafted cover letter regarding production.	0.2	\$ 250.00	\$ 50.00

800	10/6/2020	John Muller	Draft and edit Response to Motion for Partial Summary Judgment.	3.5	\$ 325.00	\$ 1,137.50
800	10/6/2020	Craig O'Neil	Draft Response to Motion for Partial Summary Judgment on the Bigfoot Note Payments.	10	\$ 250.00	\$ 2,500.00
800	10/6/2020	Craig O'Neil	Draft Wright affidavit.	1	\$ 250.00	\$ 250.00
800	10/12/2020	Craig O'Neil	Draft objection to DMAs evidence on Bigfoot Note Motion for Summary Judgment.	1.3	\$ 250.00	\$ 325.00
800	10/12/2020	Craig O'Neil	Draft surreply to Bigfoot Note Motion for Summary Judgment.	2.5	\$ 250.00	\$ 625.00
800	10/13/2020	Craig O'Neil	Draft of First Amended Complaint.	2	\$ 250.00	\$ 500.00
800	10/14/2020	Craig O'Neil	Draft Motion for Leave to Amend Complaint.	1	\$ 250.00	\$ 250.00
800	10/14/2020	Ezekiel Perez	Drafted cover correspondence for Motion to Compel.	0.3	\$ 250.00	\$ 75.00
800	10/14/2020	Ezekiel Perez	Edit draft of Amended Complaint Motion for Leave to Amend Proposed Order; finalized the same for filing and requested filing.	2.9	\$ 250.00	\$ 725.00
800	10/15/2020	Ezekiel Perez	Edited draft of Motion to compel and incorporated J Muller proposed revisions.	2.1	\$ 250.00	\$ 525.00
800	10/16/2020	Ezekiel Perez	Draft/edit motion to compel draft.	2.3	\$ 250.00	\$ 575.00

800	10/20/2020	Ezekiel Perez	Amend proposed draft of Motion to Compel to comport with response from T. Cleveland; provided draft to J. Muller for review/approval; incorporated edits finalized and requested filing.	1.3	\$ 250.00	\$ 325.00
800	10/21/2020	Craig O'Neil	Begin drafting Motion for Partial Summary Judgment on DMA's counterclaims.	1.5	\$ 250.00	\$ 375.00
800	10/22/2020	Ezekiel Perez	Edit proposed responses to requests for production and identify responsive documents; prepare drafts for service.	6.4	\$ 250.00	\$ 1,600.00
800	10/23/2020	Ezekiel Perez	Finalize subpoena/notices of deposition; Draft correspondence to T. Cleveland; served notices/subpoena.	0.3	\$ 250.00	\$ 75.00
800	10/25/2020	Craig O'Neil	Draft and researching Motion for Partial Summary Judgment arguments against Moore's fraud claims.	2.5	\$ 250.00	\$ 625.00
800	10/26/2020	Craig O'Neil	Draft Larry Wright Affidavit for KrisJenn Motion for Partial Summary Judgment's against DMA and Moore.	1	\$ 250.00	\$ 250.00
800	10/26/2020	Ezekiel Perez	Edited and finalized draft of	0.2	\$ 250.00	\$ 50.00

			motion to expedite hearing on motion to compel.			
800	10/26/2020	Ezekiel Perez	Finalize exhibits for Motion for Summary Judgment and met client for signature on affidavit.	1.1	\$ 250.00	\$ 275.00
800	10/27/2020	Craig O'Neil	Draft Answer to DMA's Amended Counterclaim filed on Oct. 14.	4.9	\$ 250.00	\$ 1,225.00
800	10/28/2020	Craig O'Neil	Draft of Second Amended Answers to Moore's Amended Counterclaims filed on Oct. 14 2020.	5	\$ 250.00	\$ 1,250.00
800	10/28/2020	Ezekiel Perez	Finalize both amended answers; conferred with J. Muller regarding the same; and requested filing.	1.3	\$ 250.00	\$ 325.00
800	10/29/2020	Ezekiel Perez	Edited letter regarding discovery request receipt date; conferred with J. Muller and R. Smeberg regarding the same; finalized draft and send to all counsel of record.	0.4	\$ 250.00	\$ 100.00
800	10/30/2020	Craig O'Neil	Draft Motion to Continue Motion for Partial Summary Judgment and Proposed Order.	1	\$ 250.00	\$ 250.00
800	10/30/2020	Ezekiel Perez	Amended Discovery Responses for all three Debtors; Bates Labeled Amended Production; and	1.9	\$ 250.00	\$ 475.00

			Served on all counsel of record.			
830	11/2/2020	Ezekiel Perez	Draft notice of expedited hearing.	0.2	\$ 250.00	\$ 50.00
830	11/2/2020	Ezekiel Perez	Work on updating current pleadings.	0.2	\$ 250.00	\$ 50.00
830	11/3/2020	Ezekiel Perez	Draft and edit proposed order on Motion to Compel.	0.9	\$ 250.00	\$ 225.00
830	11/3/2020	Ezekiel Perez	Edit motion to withdraw proposed amended pleadings and replace with corrected documents.	0.4	\$ 250.00	\$ 100.00
830	11/3/2020	Ezekiel Perez	Work on draft of proposed settlement documents.	0.3	\$ 250.00	\$ 75.00
830	11/8/2020	Ezekiel Perez	Finalize draft of client errata's and provided to L. Wright for comment and review.	0.8	\$ 250.00	\$ 200.00
830	11/10/2020	Ezekiel Perez	Begin draft of Amended Rule 26 Disclosures.	0.4	\$ 250.00	\$ 100.00
830	11/11/2020	Ezekiel Perez	Draft discovery requests to Moore DMA and Longbranch.	4.3	\$ 250.00	\$ 1,075.00
830	11/11/2020	Ezekiel Perez	Continued draft of Amended Disclosures.	1.2	\$ 250.00	\$ 300.00
830	11/12/2020	Craig O'Neil	Work on continuance to Motion for Summary Judgment.	0.2	\$ 250.00	\$ 50.00
830	11/12/2020	Ezekiel Perez	Continued draft of amended rule 26 disclosures.	0.8	\$ 250.00	\$ 200.00
830	11/16/2020	Craig O'Neil	Draft and edit response to Motion to Dismiss.	0.2	\$ 250.00	\$ 50.00

830	11/16/2020	Craig O'Neil	Draft Answer to Longbranch's Counterclaim.	3	\$ 250.00	\$ 750.00
830	11/17/2020	Craig O'Neil	Draft Answer to Longbranch's Counterclaims.	0.3	\$ 250.00	\$ 75.00
830	11/17/2020	Ezekiel Perez	Draft letter agreement concerning depositions and interrogatory responses; Incorporate J. Muller's edits and send to opposing counsel for review.	1.8	\$ 250.00	\$ 450.00
830	11/17/2020	Ezekiel Perez	Finalize draft of Answer to Longbranch Counterclaim and incorporate J. Muller edits.	0.6	\$ 250.00	\$ 150.00
830	11/17/2020	Craig O'Neil	Work on Response to Motion to Dismiss.	0.6	\$ 250.00	\$ 150.00
830	11/17/2020	Craig O'Neil	Work on Response to Motion to Dismiss.	0.2	\$ 250.00	\$ 50.00
830	11/18/2020	Craig O'Neil	Draft and edit Response to Motion to Dismiss.	0.3	\$ 250.00	\$ 75.00
830	11/18/2020	Craig O'Neil	Draft and edit Response to Motion to Dismiss.	0.1	\$ 250.00	\$ 25.00
830	11/18/2020	Ezekiel Perez	Draft Motion to Substitute as Counsel.	1.8	\$ 250.00	\$ 450.00
830	11/18/2020	Ezekiel Perez	Draft responses to DMA/Moore's second set of discovery requests.	4.8	\$ 250.00	\$ 1,200.00
830	11/19/2020	Ezekiel Perez	Draft proposed agreed judgment on Bigfoot note interpleader.	0.3	\$ 250.00	\$ 75.00
830	11/19/2020	Ezekiel Perez	Finalize draft of discovery responses and send to client for review and signature.	4.3	\$ 250.00	\$ 1,075.00

830	11/19/2020	Craig O'Neil	Work on proposed settlement terms proposed by the McLeod's.	1	\$ 250.00	\$ 250.00
830	11/20/2020	Ezekiel Perez	Finalize and served responses to discovery requests.	0.2	\$ 250.00	\$ 50.00
830	11/29/2020	John Muller	Edit and approve First Amendment to Option Agreement and Third Loan Modification Agreement.	1.2	\$ 325.00	\$ 390.00
830	11/30/2020	Craig O'Neil	Draft and edit Response to Motion to Dismiss.	8.5	\$ 250.00	\$ 2,125.00
830	11/30/2020	Ezekiel Perez	Draft joint motion to lift stay and send to J. Muller for review.	2.9	\$ 250.00	\$ 725.00
841	12/1/2020	Craig O'Neil	Draft Response to motion to dismiss.	3	\$ 250.00	\$ 750.00
841	12/1/2020	John Muller	Work on scheduling of mediation with W. Shelton.	0.2	\$ 325.00	\$ 65.00
841	12/2/2020	Ezekiel Perez	Finalize draft of motion to lift stay and to C. Hebert for comment and review.	0.6	\$ 250.00	\$ 150.00
841	12/3/2020	Craig O'Neil	Draft Reply to DMA's Response to Debtors' Motion for Partial Summary Judgment.	5.5	\$ 250.00	\$ 1,375.00
841	12/3/2020	Craig O'Neil	Draft Reply to Moore's Response to Debtors' Motion for Partial Summary Judgment.	5.5	\$ 250.00	\$ 1,375.00
841	12/4/2020	Ezekiel Perez	Edit response to 12(b)(6) motion and finalize for filing; edit replies to responses to Motion for Partial	1.4	\$ 250.00	\$ 350.00

			Summary Judgments and finalized for filing; requested filing.			
841	12/7/2020	Ezekiel Perez	Draft subpoena and deposition notices for Longbranch Energy and Darin Borders; Serve same on opposing counsel.	2.8	\$ 250.00	\$ 700.00
841	12/8/2020	Ezekiel Perez	Draft trial subpoenas for D. Strolle; J. Terrill; C. Crockett.	0.5	\$ 250.00	\$ 125.00
841	12/8/2020	Ezekiel Perez	Draft/edit amended R26 disclosures.	1.2	\$ 250.00	\$ 300.00
841	12/11/2020	Ezekiel Perez	Draft fee application; send to all required parties for review and approval.	3.1	\$ 250.00	\$ 775.00
841	12/11/2020	Ezekiel Perez	Finalize Rule 26 disclosures; Confer with J. Muller regarding the same; Serve on all counsel of record.	3.8	\$ 250.00	\$ 950.00
841	12/14/2020	Ezekiel Perez	Draft Answers to DMA and Moore's Amended Counterclaims conferred with J. Muller and W. Germany regarding the same and file final draft via ECF.	5.6	\$ 250.00	\$ 1,400.00
841	12/16/2020	Ezekiel Perez	Draft of motion to compel.	3.7	\$ 250.00	\$ 925.00
841	12/17/2020	Ezekiel Perez	Draft Motion to Compel; draft subpoenas directed at TCRG and C Crockett; conferrer with J. Muller regarding the same.	10.9	\$ 250.00	\$ 2,725.00

841	12/18/2020	Ezekiel Perez	Edit notice of hearing on Expedited Motion to Compel.	0.3	\$ 250.00	\$ 75.00
841	12/18/2020	Ezekiel Perez	Finalize motion to compel proposed order exhibits motion to expedite and proposed order with exhibits; File the same.	4.1	\$ 250.00	\$ 1,025.00
841	12/22/2020	Ezekiel Perez	Draft of proposed order; conferred with J. Muller and incorporated proposed edits.	1.8	\$ 250.00	\$ 450.00
841	12/22/2020	Ezekiel Perez	Draft third amended petition; proposed order on motion for leave to amend; and draft of motion for leave to amend.	5.1	\$ 250.00	\$ 1,275.00
841	12/27/2020	Ezekiel Perez	Finalize draft of proposed motion for leave to amend; Finalize draft of third amended complaint; Send to J. Muller for comment and review.	1.1	\$ 250.00	\$ 275.00
841	12/30/2020	Ezekiel Perez	Edit and finalize Third Amended Petition; Finalize motion for leave; finalize proposed order; filed the same.	3.5	\$ 250.00	\$ 875.00
841	12/30/2020	John Muller	Edit and revise Third Amended Complaint.	0.5	\$ 325.00	\$ 162.50
841	12/30/2020	Ezekiel Perez	Edit proposed pre-trial order.	2.6	\$ 250.00	\$ 650.00
841	12/30/2020	Ezekiel Perez	Finalize proposed order on motion to compel; provided the same to A. Krist for review.	0.2	\$ 250.00	\$ 50.00

925	1/5/2021	Ezekiel Perez	Draft proposed findings of fact and conclusions of law; confer with client; draft motion to enter; filed motion to enter order on motion to compel.	11.8	\$ 250.00	\$ 2,950.00
925	1/7/2021	Ezekiel Perez	Draft multiple correspondence to A. Krist regarding D. Moore's phone inspection; Confer with J. Muller regarding the same; Review A. Mcleod and L. Wright deposition transcripts for trial use/designations.	8.1	\$ 250.00	\$ 2,025.00
1089	4/8/2021	Ezekiel Perez	Draft motion for leave to file notice of appeal; Research appeal deadlines; draft notice of appeal.	3.1	\$250.00	\$775.00
1089	4/9/2021	Ezekiel Perez	Draft notice of appeal; Review Motion for attorney's fees and began research for response.	3.3	\$250.00	\$825.00
1089	4/13/2021	Ezekiel Perez	Research and draft response to motion for attorneys fees.	5.4	\$250.00	\$1,350.00
1089	4/14/2021	Ezekiel Perez	Continue research and draft of response to motion for attorney's fees.	3.8	\$250.00	\$950.00
1089	4/15/2021	Ezekiel Perez	Continue document review research and draft of response to motion for attorney's fees.	3.2	\$250.00	\$800.00

1089	4/16/2021	Ezekiel Perez	Research and draft response to motion for attorneys fees.	3.3	\$250.00	\$825.00
1089	4/18/2021	Ezekiel Perez	Continue drafting response to motion for attorney's fees.	2.1	\$250.00	\$525.00
1089	4/19/2021	Ezekiel Perez	Edit draft response.	0.4	\$250.00	\$100.00
1089	4/20/2021	Ezekiel Perez	Draft response to Motion to Amend; and confer with W. Germany regarding response to Motion for Attorney's fees.	2.9	\$250.00	\$725.00
1089	4/21/2021	Ezekiel Perez	Edit and finalize response to motion for fees; confer with W. Germany and J Muller regarding the same.	6.1	\$250.00	\$1,525.00
1089	4/21/2021	John Muller	Locate documents for final draft of Response to Attorney's fee. Prepare Exhibits for the same. File the Response with the Court.	3.2	\$350.00	\$1,120.00
					TOTAL:	\$76,292.50

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Muller	12.8	\$325/Hour	\$ 5,280.00
Ezekiel Perez	134.6	\$250/Hour	\$ 42,050.00
Craig O'Neil	115.1	\$250/Hour	\$ 28,775.00
Sherry Barnash	.8	\$250/Hour	\$ 187.50

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$76,292.50

**RESEARCH AND ANALYSIS
FOR PROFESSIONAL SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
841	12/18/2020	Ezekiel Perez	Ran background report for attempt of service of C. Crockett subpoena.	0.3	\$ 250.00	\$ 75.00
699	8/21/2020	Ezekiel Perez	Received produced documents and saved.	0.2	\$ 250.00	\$ 50.00
699	8/18/2020	John Muller	Research affirmative defenses which need to be added to pleadings.	1.6	\$ 325.00	\$ 520.00
699	8/3/2020	John Muller	Research and analysis regarding Black Duck's status as successor in interest to ROW.	0.6	\$ 325.00	\$ 195.00
699	8/4/2020	John Muller	Research and analysis regarding defenses to DMA's Motion for Summary Judgment regarding contract interpretation privity of estate and intent of parties.	1.2	\$ 325.00	\$ 390.00
830	11/18/2020	Craig O'Neil	Research and analysis regarding justification defense and opposition's justification defenses on tortious interference.	0.5	\$ 250.00	\$ 125.00
699	8/17/2020	Ezekiel Perez	Research and confer with J. Muller regarding compulsory counter claims in this case.	0.5	\$ 250.00	\$ 125.00
800	10/22/2020	Craig O'Neil	Research and draft Motion for Partial Summary Judgment on DMA's Breach of Contract claim.	2	\$ 250.00	\$ 500.00
800	10/22/2020	Craig O'Neil	Research and draft Motion for Partial Summary Judgment on DMA's Money had and received claims.	2.2	\$ 250.00	\$ 550.00
800	10/22/2020	Craig O'Neil	Research and draft Motion for Partial Summary Judgment on	3	\$ 250.00	\$ 750.00

			DMA's Tortious Interference Claims.			
750	9/10/2020	Craig O'Neil	Research and draft touch and concern argument for Motion for Partial Summary Judgment.	5	\$ 250.00	\$ 1,250.00
800	10/23/2020	Craig O'Neil	Research and drafting Motion for Partial Summary Judgment arguments on DMA's Bigfoot claims.	3	\$ 250.00	\$ 750.00
800	10/23/2020	Craig O'Neil	Research and drafting Motion for Partial Summary Judgment on Moore's breach of contract claims.	2	\$ 250.00	\$ 500.00
800	10/24/2020	Craig O'Neil	Research and drafting Motion for Partial Summary Judgment on Moore's tortious interference claim.	2	\$ 250.00	\$ 500.00
800	10/15/2020	Ezekiel Perez	Research case law regarding standards for motion to compel.	1.4	\$ 250.00	\$ 350.00
699	8/10/2020	Craig O'Neil	Research Federal and state case law on Covenants that Run with the Land for response to Motion for Summary Judgment.	5	\$ 250.00	\$ 1,250.00
800	10/15/2020	Paige Burrough	Research federal discovery standards	1.5	\$ 225.00	\$ 337.50
699	8/10/2020	Craig O'Neil	Research for response to Motion for Summary Judgment.	2	\$ 250.00	\$ 500.00
830	11/23/2020	Craig O'Neil	Research on justification affirmative defense.	1	\$ 250.00	\$ 250.00
800	10/21/2020	Craig O'Neil	Research on possible defenses ripe for summary judgment on DMA and Moore's counterclaims.	4	\$ 250.00	\$ 1,000.00
699	8/21/2020	Craig O'Neil	Research on property issues concerning the P-21.	0.5	\$ 250.00	\$ 125.00
699	8/18/2020	Craig O'Neil	Research on Rule 56(d) motion.	0.8	\$ 250.00	\$ 200.00

699	8/11/2020	Craig O'Neil	Research rebuttal to oppositions case law.	1	\$ 250.00	\$ 250.00
830	11/23/2020	Craig O'Neil	Research regarding affirmative defenses as basis for 12(b)(6) motion.	2	\$ 250.00	\$ 500.00
800	10/26/2020	Ezekiel Perez	Research regarding jurat requirements for Motion for Summary Judgment.	0.3	\$ 250.00	\$ 75.00
830	11/23/2020	Craig O'Neil	Research remedies for untimely dispositive motion.	1	\$ 250.00	\$ 250.00
699	8/7/2020	Craig O'Neil	Research touch and concern in Sabine cases. Locate cases that cite Sabine.	2.5	\$ 250.00	\$ 625.00
830	11/17/2020	Ezekiel Perez	Review and analyze Amended Counterclaims.	0.2	\$ 250.00	\$ 50.00
841	12/1/2020	John Muller	Review and analyze D. Moore's Response to Debtor's Motion for Summary Judgement.	0.3	\$ 325.00	\$ 97.50
841	12/30/2020	John Muller	Review and analyze DMA and Longbranch's proposed post-judgment Order.	1.2	\$ 325.00	\$ 390.00
699	8/20/2020	John Muller	Review and analyze DMA/Moore's Motion for Summary Judgment regarding Big Foot Note.	0.4	\$ 325.00	\$ 130.00
830	11/19/2020	Craig O'Neil	Review and analyze live pleadings.	1	\$ 250.00	\$ 250.00
830	11/3/2020	Ezekiel Perez	Review and analyze Pipeline management agreement.	0.3	\$ 250.00	\$ 75.00
830	11/3/2020	Craig O'Neil	Review and analyze Second Amended Complaint.	0.3	\$ 250.00	\$ 75.00
664	7/30/2020	John Muller	Review and comment on disclosures prepared by associates.	0.3	\$ 325.00	\$ 97.50
841	12/3/2020	Craig O'Neil	Review and compiling proposed exhibits to Replies.	0.5	\$ 250.00	\$ 125.00
800	10/26/2020	Craig O'Neil	Review and drafting Motion for Partial	4.3	\$ 250.00	\$ 1,075.00

			Summary Judgment on DMA's claims.			
800	10/26/2020	Craig O'Neil	Review and drafting Motion for Partial Summary Judgment on Moore's claims.	4.3	\$ 250.00	\$ 1,075.00
800	10/13/2020	John Muller	Review and edit Amended Complaint.	1	\$ 325.00	\$ 325.00
664	7/31/2020	John Muller	Review and edit conference letter.	1	\$ 325.00	\$ 325.00
830	11/16/2020	Ezekiel Perez	Review and edit draft of Answer to Amended Counterclaim.	0.4	\$ 250.00	\$ 100.00
1010	3/8/2021	Ezekiel Perez	Review and edit fee application.	0.2	\$ 250.00	\$ 50.00
800	10/26/2020	John Muller	Review and edit Motion for Partial Summary Judgment on economic loss rule privity and other affirmative defenses.	1.4	\$ 325.00	\$ 455.00
800	10/22/2020	John Muller	Review and edit objections and responses to DMA's written discovery requests.	0.7	\$ 325.00	\$ 227.50
830	11/17/2020	Ezekiel Perez	Review and edit of Answer to Longbranch'[s Counterclaim.	1.2	\$ 250.00	\$ 300.00
841	12/4/2020	John Muller	Review and edit Response to D Moore's Motion to Dismiss.	0.6	\$ 325.00	\$ 195.00
841	12/4/2020	John Muller	Review and edit Response to KrisJenn's Motion for Summary Judgment.	0.6	\$ 325.00	\$ 195.00
830	11/3/2020	Ezekiel Perez	Review and edit Second Amended Complaint draft.	0.3	\$ 250.00	\$ 75.00
699	8/13/2020	John Muller	Review and edit written discovery requests to DMA.	0.6	\$ 325.00	\$ 195.00
750	9/12/2020	Craig O'Neil	Review and finalize version 1 of the Response to DMA's Motion for Partial Summary Judgment	3.3	\$ 250.00	\$ 825.00

			regarding run with the land interpretation.			
750	9/13/2020	Ezekiel Perez	Review and identify emails responsive to subpoena and identify objections.	8.9	\$ 250.00	\$ 2,225.00
750	9/14/2020	Ezekiel Perez	Review and identify emails responsive to subpoena and identify objections; Confer with J. Muller regarding the same.	3	\$ 250.00	\$ 750.00
830	11/9/2020	Ezekiel Perez	Review and prepare documents to be used as exhibits at trial.	0.6	\$ 250.00	\$ 150.00
750	9/22/2020	Ezekiel Perez	Review and respond to correspondence from T. Cleveland regarding discovery requests; confer with J. Muller and R. Smeberg regarding the same.	0.2	\$ 250.00	\$ 50.00
664	7/31/2020	Craig O'Neil	Review and respond to S. Barnash email re: conference letter.	0.1	\$ 250.00	\$ 25.00
664	7/8/2020	Craig O'Neil	Review and revise motion to quash subpoena against David Strolle.	0.4	\$ 250.00	\$ 100.00
800	10/14/2020	Craig O'Neil	Review and revising draft of First Amended Complaint.	1.5	\$ 250.00	\$ 375.00
841	12/10/2020	Ezekiel Perez	Review client correspondence.	0.2	\$ 250.00	\$ 50.00
800	10/20/2020	John Muller	Review conference letter from T. Cleveland	0.3	\$ 325.00	\$ 97.50
750	9/4/2020	Ezekiel Perez	Review correspondence and confer with J. Muller regarding scope of review.	2.8	\$ 250.00	\$ 700.00
699	8/12/2020	Ezekiel Perez	Review correspondence regarding motion to continue and discovery drafts.	0.6	\$ 250.00	\$ 150.00
1010	3/24/2021	Ezekiel Perez	Review court filings/judgment and opinion; Client call.	2.1	\$ 250.00	\$ 525.00

1010	3/25/2021	Ezekiel Perez	Review court filings; Research law on reconsideration.	2.2	\$ 250.00	\$ 550.00
830	11/2/2020	Ezekiel Perez	Review Court's order granting leave to amend pleadings and analyze procedural issues relating to same.	0.3	\$ 250.00	\$ 75.00
699	8/4/2020	Craig O'Neil	Review Covenants Running with the Land article.	2.5	\$ 250.00	\$ 625.00
699	8/10/2020	John Muller	Review Creditor's Motion for Summary Judgment; Analyze legal arguments and review Creditor's authority.	2.3	\$ 325.00	\$ 747.50
841	12/14/2020	Ezekiel Perez	Review D. Borders document production in anticipation of deposition.	2.2	\$ 250.00	\$ 550.00
750	9/14/2020	Ezekiel Perez	Review depo notices provided by A. Krist.	0.1	\$ 250.00	\$ 25.00
830	11/3/2020	Craig O'Neil	Review disclosures and pleadings relating to McLeod's.	0.2	\$ 250.00	\$ 50.00
800	10/15/2020	Craig O'Neil	Review DMA and Moore amended pleadings with J. Muller for new causes of action and discussing how to pick causes of action off with Motion for Summary Judgment.	1.2	\$ 250.00	\$ 300.00
800	10/20/2020	Craig O'Neil	Review DMA and Moore Counterclaims and begin outlining Motion for Partial Summary Judgment.	1.5	\$ 250.00	\$ 375.00
841	12/2/2020	Ezekiel Perez	Review DMA production in anticipation of deposition of D. Moore.	8.8	\$ 250.00	\$ 2,200.00
750	9/21/2020	Ezekiel Perez	Review DMA's exhibits (pgs. 23-575 of Motion for Summary Judgment) in anticipation of hearing; confer with C. O'Neil	2.8	\$ 250.00	\$ 700.00

			and J. Muller regarding the same.			
830	10/31/2020	Ezekiel Perez	Review DMA's Motion to Continue and Response to Motion to Quash.	0.3	\$ 250.00	\$ 75.00
841	12/1/2020	Craig O'Neil	Review DMA's Response to Debtors' Motion for Partial Summary Judgment.	1	\$ 250.00	\$ 250.00
699	8/13/2020	Ezekiel Perez	review docket and created live pleadings and discovery clip.	0.7	\$ 250.00	\$ 175.00
699	8/3/2020	Ezekiel Perez	Review docket and prepare for hearing.	1.8	\$ 250.00	\$ 450.00
800	10/14/2020	Craig O'Neil	Review docket for pleading filings.	0.2	\$ 250.00	\$ 50.00
830	11/16/2020	Ezekiel Perez	Review document production and prepare deposition exhibits.	8.6	\$ 250.00	\$ 2,150.00
699	8/5/2020	John Muller	Review documents and email provided by client; Analyze whether facts exist in support of Claimants' tort claims. Evaluate merits of counterclaims and summary judgment based on economic loss rule.	2.8	\$ 325.00	\$ 910.00
750	9/2/2020	Ezekiel Perez	Review documents for privilege log; Confirm deadline to provide; Calendar the same along with reminder.	0.3	\$ 250.00	\$ 75.00
841	12/3/2020	Ezekiel Perez	Review documents/deposition preparation.	0.8	\$ 250.00	\$ 200.00
841	12/1/2020	John Muller	Review draft of Option Agreement and Loan Modification Agreement.	0.2	\$ 325.00	\$ 65.00
699	8/13/2020	Craig O'Neil	Review E. Perez edits to Agreed Order and send redline to opposing counsel for review and agreement.	0.2	\$ 250.00	\$ 50.00

699	8/12/2020	Craig O'Neil	Review email from court regarding hearings that are to be reset.	0.2	\$ 250.00	\$ 50.00
699	8/12/2020	Craig O'Neil	Review email from Natalie and the court regarding hearings that will be continued. Confer with E. Perez about Order to be sent.	0.2	\$ 250.00	\$ 50.00
699	8/13/2020	Craig O'Neil	Review email from opposing counsel and send W. Germany final Agreed Order to be filed with the court.	0.3	\$ 250.00	\$ 75.00
699	8/31/2020	Craig O'Neil	Review email from opposing counsel re: Moore deposition availability and Wright dates for availability. Send email to our group laying out tasks regarding these depositions.	0.3	\$ 250.00	\$ 75.00
699	8/20/2020	Craig O'Neil	Review email from opposing counsel regarding their opposition to our Motions for Continuance.	0.1	\$ 250.00	\$ 25.00
699	8/12/2020	Craig O'Neil	Review email sent by Germany. Respond to request the Word version of the attached Order rather than the Motion itself.	0.2	\$ 250.00	\$ 50.00
750	9/10/2020	Sherry Barnash	Review emails and discuss same with E. Perez	0.8	\$ 250.00	\$ 200.00
699	8/12/2020	Craig O'Neil	Review emails and responses between Court and Natalie Wilson. Also send email to Natalie Wilson regarding the Agreed Order.	0.2	\$ 250.00	\$ 50.00
699	8/13/2020	Craig O'Neil	Review emails between co-counsel and opposing counsel. Draft redline edits into	0.8	\$ 250.00	\$ 200.00

			Proposed Agreed Order and send redline edits of Proposed Order to E. Perez for review.			
750	9/23/2020	Craig O'Neil	Review emails from opposing counsel and client regarding discovery.	0.4	\$ 250.00	\$ 100.00
750	9/24/2020	Craig O'Neil	Review emails from opposing counsel regarding discovery.	0.5	\$ 250.00	\$ 125.00
699	8/12/2020	Craig O'Neil	Review emails from opposing counsel regarding extensions for hearing and responses.	0.2	\$ 250.00	\$ 50.00
750	9/9/2020	Ezekiel Perez	Review emails; Confer with D. Strolle by email; Reviewed and edited proposed draft of settlement agreement.	4.3	\$ 250.00	\$ 1,075.00
800	10/7/2020	Craig O'Neil	Review Exhibit D and drafting supplement to add Exhibit D to Response to Motion for Partial Summary Judgment on the Bigfoot Note Payments.	0.5	\$ 250.00	\$ 125.00
800	10/26/2020	Craig O'Neil	Review exhibits and send exhibits and Motion for Partial Summary Judgment's to Denielle for filing.	0.2	\$ 250.00	\$ 50.00
841	12/7/2020	Sherry Barnash	Review file and update taskings for Borders/Longbranch depositions.	0.2	\$ 250.00	\$ 50.00
841	12/23/2020	Ezekiel Perez	Review filed amended answers to amended complaints.	0.6	\$ 250.00	\$ 150.00
925	2/3/2021	Ezekiel Perez	Review filings.	0.2	\$ 250.00	\$ 50.00
1010	4/5/2021	John Muller	Review final judgement to determine next steps. Confer with client regarding the same.	4	\$ 350.00	\$ 1,400.00
699	8/18/2020	Craig O'Neil	Review First set of Interrogatories to DMA.	0.3	\$ 250.00	\$ 75.00

699	8/18/2020	Craig O'Neil	Review First set of Interrogatories to Moore.	0.3	\$ 250.00	\$ 75.00
699	8/18/2020	Craig O'Neil	Review First set of Requests for Production to Moore.	0.3	\$ 250.00	\$ 75.00
841	12/3/2020	John Muller	Review key documents and prepare for deposition of Daniel Moore.	7.8	\$ 325.00	\$ 2,535.00
830	11/9/2020	Ezekiel Perez	Review L. Wright deposition transcript and incorporate client errata.	4.1	\$ 250.00	\$ 1,025.00
830	11/6/2020	Ezekiel Perez	Review L. Wright deposition transcript and prepare errata.	5.6	\$ 250.00	\$ 1,400.00
830	11/8/2020	Ezekiel Perez	Review L. Wright deposition transcript and prepare errata.	0.2	\$ 250.00	\$ 50.00
830	11/9/2020	Ezekiel Perez	Review L. Wright deposition transcript and prepare errata.	1.6	\$ 250.00	\$ 400.00
830	11/12/2020	Ezekiel Perez	Review L. Wright's deposition transcript and incorporate client errata.	0.5	\$ 250.00	\$ 125.00
750	9/18/2020	Ezekiel Perez	Review Larry Wright emails	0.5	\$ 250.00	\$ 125.00
830	11/17/2020	Craig O'Neil	Review local rules and scheduling orders to determine the timeliness of opposition's Motion to Dismiss.	0.4	\$ 250.00	\$ 100.00
841	12/15/2020	Ezekiel Perez	Review Longbranch production in anticipation of deposition; prepare exhibits.	6.6	\$ 250.00	\$ 1,650.00
699	8/24/2020	Craig O'Neil	Review McCleod-Longbranch-KJR proposed settlement agreement to determine if there are still issues with privity of estate.	0.6	\$ 250.00	\$ 150.00
841	12/1/2020	Craig O'Neil	Review Moore's Response to KrisJenn's Motion for Partial	1	\$ 250.00	\$ 250.00

			Summary Judgment against Moore.			
800	10/12/2020	Craig O'Neil	Review Motion for Leave to file surreply and Order.	1.2	\$ 250.00	\$ 300.00
664	7/24/2020	Ezekiel Perez	Review Motion for Summary Judgment filed by DMA.	0.1	\$ 250.00	\$ 25.00
699	8/10/2020	Craig O'Neil	Review Motion for Summary Judgment for weaknesses in the argument. Also review arguments made in Sabine Motion for Summary Judgment.	1	\$ 250.00	\$ 250.00
750	9/7/2020	Ezekiel Perez	Review of Larry Wright's emails.	1.6	\$ 250.00	\$ 400.00
750	9/14/2020	John Muller	Review of privilege log and emails responsive to subpoena.	1.2	\$ 325.00	\$ 390.00
750	9/8/2020	John Muller	Review of privilege log.	0.6	\$ 325.00	\$ 195.00
925	1/4/2021	Ezekiel Perez	Review of TCRG emails; Confer with J. Muller regarding pretrial order and exhibit list; Review proposed changes to Order on Motion to Compel (from A. Krist); Confer with opposing counsel regarding outstanding proposed orders; Finalize proposed pretrial order; Finalize proposed exhibit list; served on opposing counsel; File exhibit list and proposed pretrial order.	11.7	\$ 250.00	\$ 2,925.00
699	8/12/2020	Craig O'Neil	Review offer emails with co-counsel and opposing counsel.	0.2	\$ 250.00	\$ 50.00
800	10/30/2020	Craig O'Neil	Review opposing counsel and J. Muller responses in re to motion for continuance on Motion for Partial	0.2	\$ 250.00	\$ 50.00

			Summary Judgment hearing.			
699	8/12/2020	Craig O'Neil	Review opposing counsel's motion to continue and raise those concerns with R. Smeberg.	0.5	\$ 250.00	\$ 125.00
699	8/18/2020	Craig O'Neil	Review opposing counsels' responses to our first set of written discovery requests.	0.5	\$ 250.00	\$ 125.00
750	9/14/2020	Bryan Lopez	Review option agreement and prepare comments relating to matters.	0.8	\$ 325.00	\$ 260.00
750	9/22/2020	Craig O'Neil	Review order regarding Stolle Privilege log.	0.2	\$ 250.00	\$ 50.00
830	11/23/2020	Craig O'Neil	Review pleadings in light of 12(b)(6) motion.	1	\$ 250.00	\$ 250.00
830	11/10/2020	Ezekiel Perez	Review production and sort for trial exhibits.	3.4	\$ 250.00	\$ 850.00
750	9/9/2020	Bryan Lopez	Review proposed settlement agreement and discuss with R. Smeberg.	0.8	\$ 325.00	\$ 260.00
699	8/18/2020	Craig O'Neil	Review Requests for Production responses to determine whether we should draft a conference letter.	0.5	\$ 250.00	\$ 125.00
841	12/1/2020	Ezekiel Perez	Review response to Motion for Summary Judgment and draft response.	0.9	\$ 250.00	\$ 225.00
841	12/21/2020	Ezekiel Perez	Review response to Motion to Compel.	0.2	\$ 250.00	\$ 50.00
664	7/30/2020	John Muller	Review responses to Requests for Disclosure.	0.3	\$ 325.00	\$ 97.50
699	8/18/2020	Craig O'Neil	Review Second Set of Requests for Production to DMA.	0.3	\$ 250.00	\$ 75.00
699	8/18/2020	Craig O'Neil	Review Second set of Requests for Production to Moore.	0.3	\$ 250.00	\$ 75.00

664	7/8/2020	Ezekiel Perez	Review subpoena and finalize draft of Motion to Quash; Confer with C. O'Neil regarding the same and send draft for review; Review C. O'Neil's proposed changes and provide updated draft to J. Muller for review/approval.	1.5	\$ 250.00	\$ 375.00
800	10/15/2020	Ezekiel Perez	Reviewed amended pleadings filed by Defendants.	0.4	\$ 250.00	\$ 100.00
800	10/28/2020	Ezekiel Perez	Reviewed and edited draft of Amended Answer/researched notes in draft made by C. O'Neil and amended accordingly.	1.6	\$ 250.00	\$ 400.00
800	10/14/2020	Ezekiel Perez	Reviewed and edited draft of Order on Motion for Summary Judgment.	0.2	\$ 250.00	\$ 50.00
750	9/24/2020	Ezekiel Perez	Reviewed and edited proposed changes to order on privilege log; returned proposed final redline edit to N. Wilson for signature.	0.3	\$ 250.00	\$ 75.00
750	9/14/2020	Ezekiel Perez	Reviewed and edited response to motion for summary judgment; Confer with J. Muller and C. O'Neil regarding the same.	4.3	\$ 250.00	\$ 1,075.00
800	10/28/2020	Ezekiel Perez	Reviewed and revised proposed objection. Confer with J Muller and C O'Neil regarding the same. Confer with D Anguiano regarding filing.	0.4	\$ 250.00	\$ 100.00
800	10/6/2020	Ezekiel Perez	Reviewed Bigfoot Motion for Summary Judgment; review and gathered documents for response	3.5	\$ 250.00	\$ 875.00

800	10/16/2020	Ezekiel Perez	Reviewed correspondence from C. Hebert.	0.1	\$ 250.00	\$ 25.00
800	10/20/2020	Ezekiel Perez	Reviewed correspondence from T. Cleveland regarding discovery issues and responded to same.	1.3	\$ 250.00	\$ 325.00
800	10/23/2020	Ezekiel Perez	Reviewed correspondence from T. Cleveland; conferred with J. Muller and coordinated noticing of depositions of F. Moore DMA and SCMED; review and edited proposed drafts.	0.8	\$ 250.00	\$ 200.00
750	9/23/2020	Ezekiel Perez	Reviewed correspondence regarding depositions; Draft conference regarding the same; conferred with J. Muller regarding the same.	1.1	\$ 250.00	\$ 275.00
800	10/19/2020	Ezekiel Perez	Reviewed discovery requests and conferred with F. Payne regarding identification of responsive documents.	0.3	\$ 250.00	\$ 75.00
800	10/21/2020	Ezekiel Perez	Reviewed discovery requests and conferred with J. Muller regarding the same.	0.3	\$ 250.00	\$ 75.00
750	9/24/2020	Ezekiel Perez	Reviewed discovery responses and Draft conference letter regarding deficiencies.	0.7	\$ 250.00	\$ 175.00
750	9/29/2020	Ezekiel Perez	Reviewed documents produced by McLeod/DMA and conferred with J. Muller regarding the same.	1.3	\$ 250.00	\$ 325.00
750	9/11/2020	Ezekiel Perez	Reviewed emails and identified proposed objectionable documents.	2.8	\$ 250.00	\$ 700.00

800	10/30/2020	Ezekiel Perez	Reviewed emails for supplemental production.	2.8	\$ 250.00	\$ 700.00
800	10/7/2020	Ezekiel Perez	Reviewed filings; conferred with J. Muller D. Anguiano regarding supplement to filing.	1.6	\$ 250.00	\$ 400.00
830	11/13/2020	Ezekiel Perez	Reviewed L. Wright deposition transcript and incorporated client errata.	5.9	\$ 250.00	\$ 1,475.00
800	10/28/2020	Ezekiel Perez	Reviewed multiple client correspondence regarding deposition transcript review.	0.2	\$ 250.00	\$ 50.00
841	12/28/2020	Ezekiel Perez	Reviewed proposed joint pre-trial order.	0.6	\$ 250.00	\$ 150.00
750	9/11/2020	Ezekiel Perez	Reviewed proposed settlement agreement and conferred with R. Smeberg regarding the same.	0.3	\$ 250.00	\$ 75.00
841	12/1/2020	Ezekiel Perez	Reviewed response to Motion for Summary Judgment and draft response to 12(b)6 motion.	0.4	\$ 250.00	\$ 100.00
800	10/13/2020	Ezekiel Perez	Reviewed responses and Draft of Motion to Compel.	3.8	\$ 250.00	\$ 950.00
699	8/24/2020	Ezekiel Perez	Reviewed subpoena and conferred with C. O'Neil regarding the same.	0.3	\$ 250.00	\$ 75.00
830	11/18/2020	Ezekiel Perez	Revise deposition notices for DMA Moore and SCMED and served on opposing counsel.	0.4	\$ 250.00	\$ 100.00
699	8/19/2020	Craig O'Neil	Revision on Motion to expedite order.	0.2	\$ 250.00	\$ 50.00
699	8/19/2020	Craig O'Neil	Revisions on Conference Letter Regarding Objections and Deposition Dates.	0.4	\$ 250.00	\$ 100.00
699	8/19/2020	Craig O'Neil	Revisions on DMA 1st Interrogatories.	0.3	\$ 250.00	\$ 75.00

699	8/19/2020	Craig O'Neil	Revisions on DMA 1st Requests for Production.	0.3	\$ 250.00	\$ 75.00
699	8/19/2020	Craig O'Neil	Revisions on Moore 1st Interrogatories.	0.3	\$ 250.00	\$ 75.00
699	8/19/2020	Craig O'Neil	Revisions on Moore 1st Requests for Production.	0.3	\$ 250.00	\$ 75.00
699	8/19/2020	Craig O'Neil	Revisions on Moore 2nd Requests for Production.	0.3	\$ 250.00	\$ 75.00
699	8/19/2020	Craig O'Neil	Revisions on Motion to Continue Bigfoot MSJ.	0.4	\$ 250.00	\$ 100.00
699	8/19/2020	Craig O'Neil	Revisions on Order granting Motion to Continue Bigfoot Motion for Summary Judgment.	0.3	\$ 250.00	\$ 75.00
699	8/19/2020	Craig O'Neil	Revisions on Transmittal letter.	0.4	\$ 250.00	\$ 100.00
699	8/19/2020	Craig O'Neil	Revisions on Transmittal Letter.	0.2	\$ 250.00	\$ 50.00
699	8/19/2020	Craig O'Neil	Revisions to Motion to expedite hearing on Motion to Continue Motion for Summary Judgment.	0.2	\$ 250.00	\$ 50.00
800	10/14/2020	Craig O'Neil	Revisions to pleadings Motion for Leave to File Amended Pleadings and Order on Motion for Leave.	0.5	\$ 250.00	\$ 125.00
699	8/18/2020	Craig O'Neil	Search Docket Control Order and determine the validity of a continuance on the Bigfoot Motion for Summary Judgment.	0.6	\$ 250.00	\$ 150.00
841	12/2/2020	Craig O'Neil	Outlining response and research issues for Reply to DMA's Response to Debtors' Motion for Summary Judgment.	3.5	\$ 250.00	\$ 875.00
841	12/2/2020	Craig O'Neil	Outlining response and research issues for Reply to Moore's Response to Debtors'	3.5	\$ 250.00	\$ 875.00

			Motion for Summary Judgment.			
750	9/10/2020	John Muller	Analysis of settlement issues and Motion for Summary Judgment response.	0.9	\$ 325.00	\$ 292.50
830	11/3/2020	Ezekiel Perez	Analysis regarding Counter-Plaintiff's damages calculations.	0.2	\$ 250.00	\$ 50.00
699	8/13/2020	John Muller	Analysis regarding potential claims by Longbranch and assess need to send written discovery requests in anticipation of such claims.	0.7	\$ 325.00	\$ 227.50
830	11/30/2020	Craig O'Neil	Analyze defenses to Breach of Contract claims by DMA/Moore.	0.3	\$ 250.00	\$ 75.00
699	8/13/2020	John Muller	Analyze fact witnesses who need to be deposed and make arrangements for noticing same.	0.5	\$ 325.00	\$ 162.50
830	11/10/2020	Craig O'Neil	Analyze joinder of parties issues and Judge's rulings on amended pleadings.	0.3	\$ 250.00	\$ 75.00
841	12/30/2020	John Muller	Analyze potential new claims based on withheld evidence discovery abuse.	0.8	\$ 325.00	\$ 260.00
830	11/2/2020	Craig O'Neil	Analyze procedural issues relating to Court's orders on joinder of parties.	0.3	\$ 250.00	\$ 75.00
830	11/3/2020	Craig O'Neil	Analyze Second Amended Complaint pleadings regarding exemplary damages.	0.3	\$ 250.00	\$ 75.00
699	8/18/2020	John Muller	Analyzed amendments to KrisJenn's request for declaratory judgment.	0.3	\$ 325.00	\$ 97.50
699	8/24/2020	Craig O'Neil	Additional research on horizontal privity of estate. Review emails regarding settlement issues dealing with privity of estate.	0.5	\$ 250.00	\$ 125.00

1120	5/20/2021	Ezekiel Perez	Revise draft application for fees.	2.3	\$250.00	\$575.00
1120	5/26/2021	Ezekiel Perez	Edit draft motion to continue.	0.2	\$250.00	\$50.00
1120	5/27/2021	Ezekiel Perez	Edit motion and order for continuance.	0.4	\$250.00	\$100.00
1120	5/27/2021	Ezekiel Perez	Edit/Finalize motion to continue.	0.3	\$250.00	\$75.00
1163	06/02/2021	Sherry Barnash	Review draft notice of hearing and provide edits.	0.1	\$ 250.00	\$ 25.00
1163	06/03/2021	Ezekiel Perez	Review draft notice of hearing.	0.2	\$ 250.00	\$ 50.00
1163	6/10/2021	Ezekiel Perez	Review motion to abate filed in appeal.	0.3	\$ 250.00	\$ 75.00
1163	6/15/2021	Ezekiel Perez	Review and analyze Defendants' Motion to Abate.	0.3	\$ 250.00	\$ 75.00
1163	7/5/2021	John Muller	Preparation and attendance of negotiations with Mcleods.	1.8	\$350.00	\$ 630.00
1163	7/5/2021	John Muller	Research review and communication with parties regarding Mcleod negotiation.	2.6	\$350.00	\$ 910.00
1216	07/06/2021	Ezekiel Perez	Review documents and draft paragraph in support of disclosure statement; confer with R. Smeberg.	1.1	\$ 250.00	\$ 275.00
1216	07/08/2021	Ezekiel Perez	Review correspondence regarding disclosure statement.	.2	\$ 250.00	\$ 50.00
1216	07/09/2021	Ezekiel Perez	Review and provide documents in support of disclosure statement to B. Lopez.	.2	\$ 250.00	\$ 50.00

1216	07/29/2021	Ezekiel Perez	Review correspondence; confer with J. Muller regarding the same.	.3	\$ 250.00	\$ 75.00
1367	8/18/2021	Sherry Barnash	Review appellate deadlines and discuss amendment to Notice of Appeal; evaluate party designations.	1	\$250.00	\$250.00
1367	8/19/2021	Sherry Barnash	Discuss strategies surrounding parties to appeal and edit amended notice of appeal.	0.2	\$250.00	\$50.00
1367	8/23/2021	Sherry Barnash	Update files and taskings.	0.5	\$250.00	\$125.00
1367	8/26/2021	Sherry Barnash	Review and update file; discuss consolidation of appeals.	0.1	\$250.00	\$25.00
1367	9/14/2021	Sherry Barnash	Update appellate deadlines in accordance with court order.	0.5	\$50.00	\$25.00
1367	9/16/2021	Sherry Barnash	Review case status and update file.	0.1	\$250.00	\$25.00
1367	9/21/2021	Sherry Barnash	Review court order regarding consolidation of appeals; update tasks, including deadlines.	1.5	\$250.00	\$375.00
1367	9/28/2021	Sherry Barnash	Review Federal Rules of Appellate Procedure regarding withdrawal of appeal procedures.	0.4	\$250.00	\$100.00
1367	9/29/2021	Sherry Barnash	Draft appeal dismissal agreement.	0.5	\$250.00	\$125.00
1367	9/30/2021	Sherry Barnash	Review and edit dismissal agreement.	0.1	\$250.00	\$25.00
1367	10/5/2021	Sherry Barnash	Review and evaluate loan agreement lien clause.	0.1	\$250.00	\$25.00

1442	10/14/2021	Sherry Barnash	Review and edit Statement of Issues and Motion for Leave to File Statement of Issues on appeal.	0.3	\$250.00	\$75.00
1442	10/28/2021	Sherry Barnash	Review and edit Proposed Terms for Right-of-Way Membership.	0.5	\$250.00	\$125.00
1500	11/9/2021	Sherry Barnash	Case management conference.	0.2	\$250.00	\$50.00
1367	8/18/2021	Sherry Barnash	Review appellate deadlines and discuss amendment to Notice of Appeal; evaluate party designations.	1	\$250.00	\$250.00
1367	8/19/2021	Sherry Barnash	Discuss strategies surrounding parties to appeal and edit amended notice of appeal.	0.2	\$250.00	\$50.00
1367	8/23/2021	Sherry Barnash	Update files and taskings.	0.5	\$250.00	\$125.00
1367	8/26/2021	Sherry Barnash	Review and update file; discuss consolidation of appeals.	0.1	\$250.00	\$25.00
1367	9/14/2021	Sherry Barnash	Update appellate deadlines in accordance with court order.	0.5	\$50.00	\$25.00
1367	9/16/2021	Sherry Barnash	Review case status and update file.	0.1	\$250.00	\$25.00
1442	10/12/2021	Ezekiel Perez	Draft 2004 request for documents; confer with J. Muller regarding the same; confer with R. Smeberg regarding proposed order and edits to objection; finalize the same.	3.7	\$250.00	\$925.00
1500	11/18/2021	Ezekiel Perez	Draft correspondence to L. Worsham regarding document production.	0.9	\$250.00	\$225.00

1367	9/24/2021	Ezekiel Perez	Edit and draft objection to proof of claim.	3.9	\$250.00	\$975.00
1367	8/26/2021	Ezekiel Perez	"Edit draft designations and issues on appeal; review docket; finalize designations and request filing; confer regarding transcript order and client authorization."	4.1	\$250.00	\$1,025.00
1367	8/5/2021	Ezekiel Perez	Edit draft notice of appeal; review correspondence from opposing counsel.	0.4	\$250.00	\$100.00
1367	10/5/2021	Ezekiel Perez	Edit draft objection.	1.9	\$250.00	\$475.00
1367	10/4/2021	Ezekiel Perez	Edit draft objection; client correspondence.	0.2	\$250.00	\$50.00
1500	11/24/2021	Ezekiel Perez	Edit draft subpoenas; client correspondence.	0.6	\$250.00	\$150.00
1367	8/13/2021	Ezekiel Perez	Edit notice of appeal and add exhibits; correspond with client regarding counteroffer; draft correspondence to L. Worsham.	1.6	\$250.00	\$400.00
1367	9/28/2021	Ezekiel Perez	Edit objection to POC and review documents in support.	2.7	\$250.00	\$675.00
1500	11/30/2021	Ezekiel Perez	Edit subpoenas and confer regarding appellate deadlines; correspondence with L. Worsham.	1.2	\$250.00	\$300.00
1500	11/23/2021	Ezekiel Perez	Edit subpoenas; correspond with opposing counsel regarding appellate deadlines.	0.6	\$250.00	\$150.00
1500	12/1/2021	Ezekiel Perez	Edit subpoenas; draft topics for Longbranch and Kuhlmann.	1.1	\$250.00	\$275.00

1367	9/30/2021	Ezekiel Perez	Edit/draft notice of dismissal of appeal.	1.5	\$250.00	\$375.00
1500	11/5/2021	Ezekiel Perez	Prepare 2004 requests.	0.6	\$250.00	\$150.00
1500	11/19/2021	Ezekiel Perez	Research appeal issues; draft correspondence to L. Worsham.	2.6	\$250.00	\$650.00
1367	8/18/2021	Ezekiel Perez	Research appeals issues.	1.9	\$250.00	\$475.00
1500	11/29/2021	Ezekiel Perez	Research in support of appeal; draft response to motion for extension of time; client conference; edit 2004 notices to McLeods, Kuhlman, and Longbranch.	7.9	\$250.00	\$1,975.00
1367	9/27/2021	Ezekiel Perez	Research regarding objection to claim; confer with J. Muller regarding the same; edit draft objection to claim.	3.6	\$250.00	\$900.00
1367	8/20/2021	Ezekiel Perez	Review amended notice of appeal prior to filing; client conference.	0.4	\$250.00	\$100.00
1367	8/17/2021	Ezekiel Perez	Review appellate deadlines and court filing.	0.5	\$250.00	\$125.00
1367	9/14/2021	Ezekiel Perez	Review appellate filings; confer with client; confer with J. Muller regarding DIP account inquiry.	0.6	\$250.00	\$150.00
1367	8/23/2021	Ezekiel Perez	Review calculations and client call.	0.3	\$250.00	\$75.00
1367	9/26/2021	Ezekiel Perez	Review correspondence from R. Smeberg.	0.2	\$250.00	\$50.00
1367	9/22/2021	Ezekiel Perez	Review correspondence from R. Smeberg; loan document review; confer with J. Muller	0.8	\$250.00	\$200.00

			regarding objection to proof of claim; review/edit draft objection to proof of claim.			
1367	9/13/2021	Ezekiel Perez	Review documents and edit draft LOI; client call and correspondence; confer with J. Mulle regarding the same.	3.3	\$250.00	\$825.00
1367	10/7/2021	Ezekiel Perez	Review fee bills and amend draft of objection to claim; prepare exhibits; review proposed final draft.	3.6	\$250.00	\$900.00
1442	10/14/2021	Ezekiel Perez	Review filings; draft statement of issues on appeal; edit the same; draft motion for leave to file statement of issues; finalized and requested filing; conferred with J. Muller and S. Barnash regarding the same.	3.1	\$250.00	\$775.00
1500	11/10/2021	Ezekiel Perez	Review filings; research contested matter discovery; confer on draft request for production.	0.8	\$250.00	\$200.00
1367	8/8/2021	Ezekiel Perez	Review final order on motion for attorney's fees and motion to reform judgment.	0.2	\$250.00	\$50.00
1367	8/11/2021	Ezekiel Perez	Review McLeod fee bills and filings and confer with J. Muller regarding settlement negotiations.	0.8	\$250.00	\$200.00
1367	8/17/2021	Ezekiel Perez	Review McLeod financing documents.	0.2	\$250.00	\$50.00
1367	9/21/2021	Ezekiel Perez	Review McLeod production; confer with J. Muller regarding objection to proof of claim.	3.7	\$250.00	\$925.00

1442	10/26/2021	Ezekiel Perez	Review record on appeal; correspond with opposing counsel regarding court's order to file joint advisory.	0.4	\$250.00	\$100.00
1500	11/19/2021	Ezekiel Perez	Research appeal issues; draft correspondence to L. Worsham.	2.6	\$250.00	\$650.00
1367	8/18/2021	Ezekiel Perez	Research appeals issues.	1.9	\$250.00	\$475.00
1500	11/29/2021	Ezekiel Perez	Research in support of appeal; draft response to motion for extension of time; client conference; edit 2004 notices to McLeods, Kuhlman, and Longbranch.	7.9	\$250.00	\$1,975.00
					TOTAL:	\$90,412.50

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Muller	33.9	\$325/Hour	\$ 12,657.50
Bryan Lopez	1.9	\$325/Hour	\$ 617.50
Ezekiel Perez	206.4	\$250/Hour	\$ 53,050.00
Craig O'Neil	88.3	\$250/Hour	\$ 22,075.00
Sherry Barnash	7.0	\$250/Hour	\$ 1,675.00
Paige Burrough	1.5	\$225/Hour	\$ 337.50

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$90,412.50

**CONFERENCES AND MEETINGS
FOR PROFESSIONAL SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
664	7/13/2020	Ezekiel Perez	Confer with J. Muller regarding answer drafts and case deadlines; Edit draft of motion to quash and objections; Edit draft answers; Send draft of motion to quash to client and R. Smeberg for comment and review; Review client communications.	2.2	\$ 250.00	\$ 550.00
664	7/14/2020	Ezekiel Perez	Confer with J. Muller regarding edits to Motion to Quash; Review final proposed draft; review client correspondence; Edit draft; gather exhibit; request filing.	0.8	\$ 250.00	\$ 200.00
664	7/15/2020	Ezekiel Perez	Confer with J. Muller and R. Smeberg about potential third party claims in adversary and draft of memo; Correspond with D. Strolle; Confer with D. Anguiano regarding filed motion to quash and court's concerns; Edit draft of proposed order; confer with D. Anguiano regarding edits to first amended motion; Confer with J. Muller regarding the same.	1.1	\$ 250.00	\$ 275.00
664	7/22/2020	Craig O'Neil	Discuss next steps and strategy with J. Muller and R. Smeberg.	0.2	\$ 250.00	\$ 50.00
664	7/23/2020	Ezekiel Perez	Confer with R. Smeberg regarding case documents and provide the same to him.	0.3	\$ 250.00	\$ 75.00
664	7/23/2020	John Muller	Muller status conference; Conference with Michael Black.	0.4	\$ 325.00	\$ 130.00

664	7/24/2020	Craig O'Neil	Discuss Motion for Summary Judgment response with Sherry.	0.1	\$ 250.00	\$ 25.00
664	7/28/2020	Craig O'Neil	Phone conference regarding response to Motion for Summary Judgment with J. Muller R. Smeberg and E. Perez.	1	\$ 250.00	\$ 250.00
664	7/28/2020	Ezekiel Perez	Confer with J. Muller R. Smeberg and C. O'Neil regarding Motion for Summary Judgment response motion to compel and motion for continuance; Confer with S. Barnash regarding update task list on matter.	0.8	\$ 250.00	\$ 200.00
664	7/28/2020	John Muller	Litigation Team Meeting.	1	\$ 325.00	\$ 325.00
664	7/28/2020	Craig O'Neil	Discuss Motion for Summary Judgment defenses with E. Perez.	0.1	\$ 250.00	\$ 25.00
664	7/29/2020	John Muller	Conference with Bill Kulman; Conference with John Muller; Conference with associate regarding disclosures.	0.7	\$ 325.00	\$ 227.50
664	7/29/2020	Ezekiel Perez	Confer with C. O'Neil regarding disclosure deadline and task management; Draft disclosures and send to C. O'Neil for comment and review; conferred with D. Anguiano regarding E-filing requirements and credentials.	2.3	\$ 250.00	\$ 575.00
664	7/29/2020	Craig O'Neil	Discuss Disclosure with R. Smeberg E. Perez and D. Anguiano; send email to R. Smeberg with disclosures and email requesting document	0.4	\$ 250.00	\$ 100.00

			production to opposing counsel.			
664	7/30/2020	Ezekiel Perez	Confer with D. Anguiano and C. O'Neil regarding initial disclosures and review R. Smeberg's proposed edits; Finalize draft; conferred with J. Muller and served disclosures on opposing counsel.	1.1	\$ 250.00	\$ 275.00
664	7/30/2020	Craig O'Neil	Discuss disclosure list with D. Anguiano.	0.2	\$ 250.00	\$ 50.00
664	7/31/2020	Craig O'Neil	Discuss response to D. Moore's Partial Motion for Summary Judgment.	0.2	\$ 250.00	\$ 50.00
699	8/3/2020	Ezekiel Perez	Confer with D. Strolle's office regarding hearing.	0.4	\$ 250.00	\$ 100.00
699	8/3/2020	Craig O'Neil	Discuss conference letter with S. Barnash.	0.2	\$ 250.00	\$ 50.00
699	8/4/2020	Ezekiel Perez	Confer with C. O'Neil regarding tasking and preliminary research.	0.2	\$ 250.00	\$ 50.00
699	8/4/2020	John Muller	Confer with Client and R. Smeberg regarding potential settlement.	0.5	\$ 325.00	\$ 162.50
699	8/4/2020	Craig O'Neil	Discuss Motion for Summary Judgment response with J. Muller.	0.3	\$ 250.00	\$ 75.00
699	8/4/2020	Craig O'Neil	Discuss Motion for Summary Judgment with E. Perez.	0.1	\$ 250.00	\$ 25.00
699	8/5/2020	Craig O'Neil	Discuss Orders to pull from Pacer with D. Anguiano	0.1	\$ 250.00	\$ 25.00
699	8/6/2020	John Muller	Conference with Z. Perez and C. O'Neil regarding defenses to DMA's Motion for Summary Judgment.	0.3	\$ 325.00	\$ 97.50
699	8/6/2020	Ezekiel Perez	Confer with J. Muller and C. O'Neil regarding Motion for	0.3	\$ 250.00	\$ 75.00

			Summary Judgment response research.			
699	8/6/2020	Craig O'Neil	Discuss Motion for Summary Judgment arguments and potential sur reply with J. Muller.	0.4	\$ 250.00	\$ 100.00
699	8/6/2020	Craig O'Neil	Discuss research on Run with the Land with J. Muller and E. Perez.	0.3	\$ 250.00	\$ 75.00
699	8/10/2020	Ezekiel Perez	Confer with D. Strolle and T. George regarding production of documents subject to court's order.	0.5	\$ 250.00	\$ 125.00
699	8/10/2020	Ezekiel Perez	Confer with J Muller regarding Motion for Summary Judgment response and proposed continuance.	0.4	\$ 250.00	\$ 100.00
699	8/10/2020	Ezekiel Perez	Confer with J. Muller regarding case status and proposed offer of judgment; Provide live pleadings clip to J. Muller.	0.6	\$ 250.00	\$ 150.00
699	8/10/2020	Craig O'Neil	Discuss legal theory on Motion for Summary Judgment and strategy in agreeing to extension of time for Motion for Summary Judgment hearing and filing deadline with J. Muller.	0.7	\$ 250.00	\$ 175.00
699	8/11/2020	Craig O'Neil	Confer with J. Muller whether we have an extension on the Motion for Summary Judgment.	0.1	\$ 250.00	\$ 25.00
699	8/11/2020	Ezekiel Perez	Confer with office of D. Strolle regarding production of documents and volume of production.	0.2	\$ 250.00	\$ 50.00
699	8/11/2020	Ezekiel Perez	Confer with C. O'Neil regarding timing and draft status	0.2	\$ 250.00	\$ 50.00
699	8/11/2020	Craig O'Neil	Discuss continuance on Motion for Summary	0.3	\$ 250.00	\$ 75.00

			Judgment with E. Perez.			
699	8/12/2020	Craig O'Neil	Phone call with E. Perez regarding draft of Order.	0.1	\$ 250.00	\$ 25.00
699	8/12/2020	Craig O'Neil	Phone conference with J. Muller and E. Perez regarding time needed to submit privilege log.	0.2	\$ 250.00	\$ 50.00
699	8/12/2020	Craig O'Neil	Conference call with R. Smeberg and opposing counsel regarding motion for continuance and Agreed Order.	0.2	\$ 250.00	\$ 50.00
699	8/12/2020	Ezekiel Perez	Confer with J. Muller and R. Smeberg by email regarding proposed order draft.	0.3	\$ 250.00	\$ 75.00
699	8/12/2020	Craig O'Neil	Discuss Agreed Order terms with J. Muller and W. Germany.	0.3	\$ 250.00	\$ 75.00
699	8/13/2020	Ezekiel Perez	Confer with J. Muller regarding draft of discovery requests and provided preliminary draft; Reviewed docket and created live pleadings and discovery clip.	1.1	\$ 250.00	\$ 275.00
699	8/13/2020	Craig O'Neil	Discuss our Motion for Partial Summary Judgment position with W. Germany.	1	\$ 250.00	\$ 250.00
699	8/14/2020	Craig O'Neil	Discuss pleading deadline extension with J. Muller.	0.1	\$ 250.00	\$ 25.00
699	8/17/2020	Ezekiel Perez	Confer with J. Muller regarding outstanding tasks.	0.2	\$ 250.00	\$ 50.00
699	8/17/2020	Craig O'Neil	Discuss KrisJenn pleading issues and defenses with J. Muller.	1	\$ 250.00	\$ 250.00
699	8/17/2020	Craig O'Neil	Discuss whether offer of Judgment is procedural or substantive law with J. Muller.	0.6	\$ 250.00	\$ 150.00

699	8/18/2020	Craig O'Neil	Meet with J. Muller on opposing counsels' responses to our first set of Requests for Production.	0.5	\$ 250.00	\$ 125.00
699	8/18/2020	Craig O'Neil	Meeting with J. Muller and E. Perez re: tasks to be done by the end of the day on the case. i.e., conference letter discovery requests amended pleadings. Also Discuss the weakness of Offer of Judgment.	0.2	\$ 250.00	\$ 50.00
699	8/18/2020	Ezekiel Perez	Confer with J. Muller regarding revisions to pleadings and edit proposed final drafts.	1.2	\$ 250.00	\$ 300.00
699	8/18/2020	Craig O'Neil	Discuss Bigfoot Motion for Summary Judgment with J. Muller and E. Perez.	0.4	\$ 250.00	\$ 100.00
699	8/18/2020	Craig O'Neil	Discuss initial contact with Jeff Duke regarding Borders deposition with R. Smeberg.	0.2	\$ 250.00	\$ 50.00
699	8/19/2020	Craig O'Neil	Meeting with J. Muller and R. Smeberg to discuss defenses and amended pleadings.	0.7	\$ 250.00	\$ 175.00
699	8/20/2020	Craig O'Neil	Phone call with J. Muller and S. Johnson regarding Pigg deposition and Boerner Dennis and Franklin documents.	0.3	\$ 250.00	\$ 75.00
699	8/20/2020	Craig O'Neil	Phone update with R. Smeberg regarding documents transmitted on 8/19/20.	0.1	\$ 250.00	\$ 25.00
699	8/20/2020	Craig O'Neil	Conference call with J. Muller and R. Smeberg regarding concerns of terms with settlement deal.	0.3	\$ 250.00	\$ 75.00
699	8/20/2020	Craig O'Neil	Follow up call with D. Anguiano on Motion to Continue.	0.1	\$ 250.00	\$ 25.00

699	8/20/2020	Craig O'Neil	Follow up call with J. Muller regarding Sam Johnson call next steps for Pigg deposition and Boerner Dennis and Franklin documents.	0.2	\$ 250.00	\$ 50.00
699	8/21/2020	Ezekiel Perez	Confer with C. O'Neil regarding third party subpoena requirements; Provided requested documents	0.2	\$ 250.00	\$ 50.00
699	8/24/2020	Craig O'Neil	Discuss issues with proposed Longbranch settlement agreement with J. Muller.	0.2	\$ 250.00	\$ 50.00
699	8/24/2020	Craig O'Neil	Discuss motion to continue hearing for tomorrow morning with J. Muller.	0.3	\$ 250.00	\$ 75.00
699	8/24/2020	Craig O'Neil	Discuss verification with J. Muller and task D. Anguiano with verification.	0.1	\$ 250.00	\$ 25.00
699	8/25/2020	Craig O'Neil	Discuss issues with touch and concern and privity of estate elements of run with the land law and settlement agreement with J. Muller	0.4	\$ 250.00	\$ 100.00
699	8/25/2020	Craig O'Neil	Discuss settlement agreement issues and concerns with J. Muller.	0.6	\$ 250.00	\$ 150.00
699	8/25/2020	Craig O'Neil	Discuss terms of Pigg Deposition negotiations.	0.1	\$ 250.00	\$ 25.00
699	8/25/2020	Craig O'Neil	Discuss third party deposition notice issues with E. Perez.	0.2	\$ 250.00	\$ 50.00
699	8/26/2020	Ezekiel Perez	Confer with R. Smeberg regarding case status and review correspondence.	0.2	\$ 250.00	\$ 50.00
699	8/27/2020	Craig O'Neil	Phone call with J. Muller regarding Run With the Land issues.	0.1	\$ 250.00	\$ 25.00
750	9/2/2020	Craig O'Neil	Discuss long branch settlement arguments	0.5	\$ 250.00	\$ 125.00

			and strategy for Run With the Land Motion for Summary Judgment with J. Muller.			
750	9/3/2020	Ezekiel Perez	Confer with D. Strolle regarding files produced.	0.7	\$ 250.00	\$ 175.00
800	9/3/2020	Ezekiel Perez	Confer with D. Strolle regarding files produced.	0.7	\$ 250.00	\$ 175.00
750	9/3/2020	Ezekiel Perez	Confer with J. Muller and review files provided by D. Strolle	3.3	\$ 250.00	\$ 825.00
750	9/4/2020	Craig O'Neil	Discuss Longbranch deal with J. Muller and issues regarding ROW in DMA deal.	0.4	\$ 250.00	\$ 100.00
750	9/8/2020	Ezekiel Perez	Confer with J. Muller; Email D. Strolle regarding privilege log status	2.6	\$ 250.00	\$ 650.00
750	9/8/2020	Craig O'Neil	Discuss privilege log and Motion for Summary Judgment due dates and progress with E. Perez.	0.1	\$ 250.00	\$ 25.00
750	9/8/2020	Craig O'Neil	Discuss the Court's Order for leave to amend pleadings with Denielle. Coordinate the filing of amended pleadings with E. Perez.	0.1	\$ 250.00	\$ 25.00
750	9/9/2020	Craig O'Neil	Discuss email evidence and issues with filing amended answers with D. Anguiano.	0.2	\$ 250.00	\$ 50.00
750	9/10/2020	Craig O'Neil	Phone call regarding facts with R. Smeberg and client.	0.4	\$ 250.00	\$ 100.00
750	9/10/2020	Ezekiel Perez	Confer with W. Germany regarding pleadings deadline; Confer with D. Strolle regarding privilege log deadline and submission; Met with client; Continued review of emails.	4.6	\$ 250.00	\$ 1,150.00

750	9/10/2020	Craig O'Neil	Discuss long branch settlement issues and Motion for Summary Judgment response arguments with J. Muller.	1.1	\$ 250.00	\$ 275.00
750	9/11/2020	Bryan Lopez	Conference regarding proposed settlement agreement and attention to real estate issues.	0.8	\$ 325.00	\$ 260.00
750	9/14/2020	Ezekiel Perez	Confer with Michael Black regarding proposed agreed motion to modify scheduling order and provided proposed comments/edits.	0.3	\$ 250.00	\$ 75.00
750	9/14/2020	Ezekiel Perez	Confer with J. Muller regarding proposed privileged documents.	0.2	\$ 250.00	\$ 50.00
750	9/14/2020	John Muller	Client meeting and review of Motion for Partial Summary Judgment and exhibits.	0.8	\$ 325.00	\$ 260.00
750	9/16/2020	Ezekiel Perez	Confer with D. Strolle regarding requirements for order.	0.2	\$ 250.00	\$ 50.00
750	9/16/2020	Craig O'Neil	Discuss SCMED depo notice with E. Perez.	0.1	\$ 250.00	\$ 25.00
750	9/18/2020	Paige Burrough	Confer with C. O'Neil on gathering opposing counsel's Motion for Summary Judgment authority;	0.1	\$ 225.00	\$ 22.50
750	9/18/2020	Ezekiel Perez	Confer with C. O'Neil regarding Motion for Summary Judgment response and case tasks	0.3	\$ 250.00	\$ 75.00
750	9/18/2020	Ezekiel Perez	Confer with D. Anguiano regarding deposition date and setting up court reporter .	0.1	\$ 250.00	\$ 25.00
750	9/22/2020	Craig O'Neil	Post-hearing conference with client.	1.2	\$ 250.00	\$ 300.00
750	9/22/2020	Ezekiel Perez	Confer with J. Muller regarding supplemental discovery; Draft	0.5	\$ 250.00	\$ 125.00

			correspondence to client regarding the same.			
750	9/22/2020	Ezekiel Perez	Confer with D. Stolle regarding issuance of order and production of documents in conformity with court's order.	0.2	\$ 250.00	\$ 50.00
750	9/22/2020	Ezekiel Perez	Confer with F. Payne regarding draft of conference letter; Draft substance of conference letter regarding discovery responses.	0.8	\$ 250.00	\$ 200.00
750	9/23/2020	Ezekiel Perez	Confer with R. Smeberg and J. Muller regarding document production; emails T. Cleveland regarding the same.	0.3	\$ 250.00	\$ 75.00
750	9/23/2020	Ezekiel Perez	Confer with W. Germany regarding document production.	0.2	\$ 250.00	\$ 50.00
750	9/23/2020	Ezekiel Perez	Confer with D. Anguiano and F. Payne regarding document production; coordinated the same; review previously produced documents.	1.3	\$ 250.00	\$ 325.00
750	9/24/2020	Ezekiel Perez	Confer with J. Muller; Edited next draft of conference letter and served on opposing counsel.	1.1	\$ 250.00	\$ 275.00
750	9/24/2020	Ezekiel Perez	Confer with J. Muller regarding production status and conversation with T. Cleveland regarding the same; Draft conference letter regarding the same.	2.1	\$ 250.00	\$ 525.00
750	9/25/2020	Ezekiel Perez	Confer with J. Muller regarding proposed draft; edited the same and finalized letter; served letter upon all counsel of record.	1.2	\$ 250.00	\$ 300.00

750	9/25/2020	Ezekiel Perez	Client meeting to obtain documents and discuss deposition.	1.6	\$ 250.00	\$ 400.00
750	9/28/2020	John Muller	Meet with L. Wright to prepare for depo	1	\$ 325.00	\$ 325.00
750	9/28/2020	Ezekiel Perez	Confer with W. Germany regarding deposition link; emailed A Krist regarding the same.	0.2	\$ 250.00	\$ 50.00
750	9/28/2020	Ezekiel Perez	Corresponded with A. Krist; conferred with J. Muller regarding the same.	0.3	\$ 250.00	\$ 75.00
750	9/29/2020	Ezekiel Perez	Met with J. Muller and client post deposition; review documents provided by client.	0.8	\$ 250.00	\$ 200.00
750	9/29/2020	Craig O'Neil	Discuss Bigfoot note payment and Motion for Summary Judgment response evidence with E. Perez.	0.1	\$ 250.00	\$ 25.00
750	9/30/2020	Ezekiel Perez	Confer with J. Muller regarding amended pleadings and assisted with deposition preparation and set-up.	0.5	\$ 250.00	\$ 125.00
750	9/30/2020	Ezekiel Perez	Corresponded with A. Krist and T. Cleveland regarding access to deposition and exhibit exchange.	0.2	\$ 250.00	\$ 50.00
800	10/5/2020	Ezekiel Perez	Met with client and review correspondence and documents.	0.4	\$ 250.00	\$ 100.00
800	10/5/2020	Ezekiel Perez	Confer with J. Muller and C. O'Neil regarding response to Bigfoot Motion for Summary Judgment; retrieved documents for response.	1.7	\$ 250.00	\$ 425.00
800	10/7/2020	Ezekiel Perez	Confer with J. Muller regarding preparation for deposition of A. McLeod.	0.5	\$ 250.00	\$ 125.00
800	10/7/2020	Craig O'Neil	Discuss Motion for Partial Summary Judgment Response to	0.1	\$ 250.00	\$ 25.00

			Bigfoot Note Payments and arguments with J. Muller.			
800	10/9/2020	Ezekiel Perez	Confer with R. Smeberg and J. Muller regarding depo of J. Mcleod.	0.2	\$ 250.00	\$ 50.00
800	10/12/2020	Ezekiel Perez	Confer with C. O'Neil regarding motion for leave to file surreply.	0.1	\$ 250.00	\$ 25.00
800	10/13/2020	Craig O'Neil	Post-hearing debriefing with clients J. Muller and W. Germany.	1	\$ 250.00	\$ 250.00
800	10/13/2020	Ezekiel Perez	Confer with F Payne regarding organization of production and review for privilege.	0.3	\$ 250.00	\$ 75.00
800	10/13/2020	Craig O'Neil	Discuss First Amended Complaint with J. Muller and R. Smeberg.	0.2	\$ 250.00	\$ 50.00
800	10/13/2020	Craig O'Neil	Discuss strategy on pleadings and discovery with litigation team.	1	\$ 250.00	\$ 250.00
800	10/14/2020	Ezekiel Perez	Confer with C. O'Neil regarding draft of amended pleadings and review draft.	0.2	\$ 250.00	\$ 50.00
800	10/14/2020	Craig O'Neil	Discuss Order on Bigfoot Note Payment with J. Muller.	0.2	\$ 250.00	\$ 50.00
800	10/14/2020	Craig O'Neil	Discuss pleadings actions with E. Perez.	0.4	\$ 250.00	\$ 100.00
800	10/15/2020	Ezekiel Perez	Confer with F. Payne regarding document production review and indexing.	0.2	\$ 250.00	\$ 50.00
800	10/15/2020	Ezekiel Perez	Confer with J. Muller and Draft supplement to Motion for Leave to Amend Pleadings.	0.9	\$ 250.00	\$ 225.00
800	10/15/2020	Craig O'Neil	Discuss Pleadings with J. Muller and E. Perez.	0.7	\$ 250.00	\$ 175.00
800	10/19/2020	Ezekiel Perez	Confer with R. Smeberg regarding request for call from N. Wilson.	0.1	\$ 250.00	\$ 25.00

800	10/19/2020	Ezekiel Perez	Confer with S. Barnash regarding case deadline update.	0.2	\$ 250.00	\$ 50.00
800	10/19/2020	Ezekiel Perez	Confer with J. Muller R. Smeberg and C. O'Neil regarding ongoing communications with opposing counsel regarding proposed order on Motion for Summary Judgment. Confer with W. Germany regarding the same.	1.1	\$ 250.00	\$ 275.00
800	10/19/2020	Craig O'Neil	Discuss Motion for Summary Judgment with E. Perez.	0.1	\$ 250.00	\$ 25.00
800	10/19/2020	Craig O'Neil	Discuss Order regarding Bigfoot Note Motion for Summary Judgment with E. Perez.	0.2	\$ 250.00	\$ 50.00
800	10/20/2020	Ezekiel Perez	Confer with J. Muller and Draft correspondence to N. Wilson regarding prior phone call requests.	0.4	\$ 250.00	\$ 100.00
800	10/20/2020	Ezekiel Perez	Confer with J. Muller and W. Germany regarding issue with proposed order; Draft correspondence to C. Hebert regarding the same; review response to proposed feedback.	0.9	\$ 250.00	\$ 225.00
800	10/21/2020	Ezekiel Perez	Met with client to discuss document production.	1.4	\$ 250.00	\$ 350.00
800	10/21/2020	Ezekiel Perez	Traveled to and conferred with W. Germany regarding email production; obtained flash drive containing the same.	1.2	\$ 250.00	\$ 300.00
800	10/21/2020	Craig O'Neil	Discuss adding affirmative defense of justification with E. Perez.	0.4	\$ 250.00	\$ 100.00

800	10/22/2020	Ezekiel Perez	Confer with W. Germany by email regarding production of communications.	0.1	\$ 250.00	\$ 25.00
800	10/22/2020	Ezekiel Perez	Corresponded with T. Cleveland regarding second set of written discovery and request to expedite hearing on motion to compel.	0.2	\$ 250.00	\$ 50.00
800	10/22/2020	Craig O'Neil	Discuss Motion for Partial Summary Judgment against DMA with J. Muller.	0.3	\$ 250.00	\$ 75.00
800	10/22/2020	Craig O'Neil	Discuss Motion for Partial Summary Judgment arguments with J. Muller and discussing how to deal with the Bigfoot Note claims.	0.4	\$ 250.00	\$ 100.00
800	10/23/2020	Ezekiel Perez	Met with client and J. Muller; call to M. Black; conferred with F. Payne regarding calling Panola County court.	0.8	\$ 250.00	\$ 200.00
800	10/23/2020	John Muller	Confer with T. Cleveland regarding discovery issues.	0.2	\$ 325.00	\$ 65.00
800	10/23/2020	Ezekiel Perez	Confer with W. Germany regarding amended discovery production.	0.2	\$ 250.00	\$ 50.00
800	10/23/2020	Ezekiel Perez	Confer with J. Muller regarding documents for settlement agreement provided the same to F. Payne.	0.3	\$ 250.00	\$ 75.00
800	10/27/2020	Ezekiel Perez	Conference with C. O'Neil and W. Germany regarding amended answers to revised pleadings.	0.5	\$ 250.00	\$ 125.00
800	10/27/2020	Ezekiel Perez	Confer with J. Muller regarding filed Motion and Exhibits.	0.2	\$ 250.00	\$ 50.00
800	10/28/2020	John Muller	Confer with T. Cleveland regarding discovery issues.	0.2	\$ 325.00	\$ 65.00

800	10/28/2020	Ezekiel Perez	Confer with C. O'Neil J. Muller and W. Germany regarding objection to motion for leave to amend and answer deadline; Draft correspondence to opposing counsel conferring on expedited consideration.	0.6	\$ 250.00	\$ 150.00
800	10/28/2020	Ezekiel Perez	Confer with F. Payne regarding background and layout for trial exhibit/PowerPoint.	0.3	\$ 250.00	\$ 75.00
800	10/28/2020	Craig O'Neil	Discuss filings with Denielle. Confer on how to file objection to joinder.	0.2	\$ 250.00	\$ 50.00
800	10/28/2020	Craig O'Neil	Discuss Motion for Partial Summary Judgment scheduling with Denielle.	0.2	\$ 250.00	\$ 50.00
800	10/28/2020	Craig O'Neil	Discuss objections to DMA and Moore Counterclaims with E. Perez and J. Muller. Draft Final revisions to objections and send to Denielle for filing.	0.5	\$ 250.00	\$ 125.00
800	10/28/2020	Craig O'Neil	Discuss objections to DMA and Moore's joinder of parties with J. Muller and E. Perez. Researching and drafting of these objections and sending to E. Perez for next draft review.	2	\$ 250.00	\$ 500.00
800	10/29/2020	Ezekiel Perez	Confer with C. O'Neil and D. Anguiano regarding status of Motion to Continue Motion for Summary Judgment hearing.	0.1	\$ 250.00	\$ 25.00
800	10/29/2020	Ezekiel Perez	Confer with C. O'Neil and edited draft of Motion to Expedite and Order.	0.4	\$ 250.00	\$ 100.00

800	10/29/2020	Craig O'Neil	Discuss Motion for Continuance with E. Perez.	0.2	\$ 250.00	\$ 50.00
800	10/30/2020	Craig O'Neil	Confer with R. Smeberg and Denielle on Motion to Continue.	0.2	\$ 250.00	\$ 50.00
800	10/30/2020	Ezekiel Perez	Confer with F. Payne regarding Bates labeling instructions and issue.	0.2	\$ 250.00	\$ 50.00
800	10/30/2020	Ezekiel Perez	Confer with J. Muller regarding responses filed by DMA.	0.2	\$ 250.00	\$ 50.00
800	10/30/2020	Craig O'Neil	Discuss Settlement lawsuit and revolving line of credit with client.	0.4	\$ 250.00	\$ 100.00
830	11/3/2020	Ezekiel Perez	Correspondence with T. Cleveland and W. Germany regarding proposed deposition dates.	0.3	\$ 250.00	\$ 75.00
830	11/4/2020	Ezekiel Perez	Teleconference with W. Germany regarding pending Motion for Summary Judgment.	0.2	\$ 250.00	\$ 50.00
830	11/4/2020	Sherry Barnash	Confer with J. Muller E. Perez and F. Payne re case status and deposition errata; review deadlines and update taskings.	0.5	\$ 250.00	\$ 125.00
830	11/5/2020	John Muller	Meeting with L. Wright to discuss deposition testimony.	2	\$ 325.00	\$ 650.00
830	11/5/2020	Ezekiel Perez	Met with client and review deposition transcript; Drafted proposed errata at client's request.	7.1	\$ 250.00	\$ 1,775.00
830	11/5/2020	Ezekiel Perez	Teleconference with C. Hebert regarding registry balance and order to disburse funds.	0.2	\$ 250.00	\$ 50.00
830	11/5/2020	Ezekiel Perez	Teleconference with L. Worsham Counsel for McLeod's.	0.3	\$ 250.00	\$ 75.00
830	11/10/2020	Ezekiel Perez	Confer with the Court regarding setting on objection to pleading.	0.3	\$ 250.00	\$ 75.00

830	11/11/2020	John Muller	Meeting with client to discuss trial exhibits.	1.5	\$ 325.00	\$ 487.50
830	11/11/2020	Ezekiel Perez	Met with client to review prospective trial exhibits.	2.5	\$ 250.00	\$ 625.00
830	11/12/2020	Ezekiel Perez	Confer with J. Muller regarding Longbranch settlement and provided requested documents to W. Kuhlmann for document draft.	0.4	\$ 250.00	\$ 100.00
830	11/17/2020	Ezekiel Perez	Confer with W. Germany regarding answer to Longbranch Counterclaim.	0.2	\$ 250.00	\$ 50.00
830	11/19/2020	Ezekiel Perez	Confer with client regarding discovery responses.	0.2	\$ 250.00	\$ 50.00
830	11/23/2020	Ezekiel Perez	Confer with W. Germany regarding case deadlines and scheduled hearings.	0.2	\$ 250.00	\$ 50.00
830	11/25/2020	John Muller	Conference with R. Smeberg and L. Worsham regarding option agreement and expedited motion for approval in bankruptcy court.	0.4	\$ 325.00	\$ 130.00
841	12/2/2020	John Muller	Correspondence with proposed mediator's office regarding scheduling and availability for in-person mediation.	0.2	\$ 325.00	\$ 65.00
841	12/2/2020	John Muller	Correspondence with T. Cleveland regarding mediation.	0.1	\$ 325.00	\$ 32.50
841	12/3/2020	Ezekiel Perez	Correspond with T. Cleveland regarding D. Borders' deposition availability.	0.1	\$ 250.00	\$ 25.00
841	12/4/2020	Craig O'Neil	Discuss Response to 12(b)6 and Motion for Summary Judgment Reply edits and filing with E. Perez.	0.3	\$ 250.00	\$ 75.00

841	12/7/2020	Ezekiel Perez	Confer with W. Germany regarding status of hearings and outcome.	0.2	\$ 250.00	\$ 50.00
841	12/7/2020	Ezekiel Perez	Confer with client in preparation of mediation.	0.7	\$ 250.00	\$ 175.00
841	12/7/2020	Craig O'Neil	Discuss outcome of Motion for Summary Judgment and Motion to Dismiss hearing with E. Perez.	0.3	\$ 250.00	\$ 75.00
841	12/11/2020	Ezekiel Perez	Confer and multiple correspondence with C. Hebert regarding bigfoot note order and draft motion.	0.6	\$ 250.00	\$ 150.00
841	12/15/2020	Sherry Barnash	Confer with E. Perez regarding trial preparation.	0.1	\$ 250.00	\$ 25.00
841	12/16/2020	Ezekiel Perez	Confer with W. Germany regarding case status.	0.2	\$ 250.00	\$ 50.00
841	12/18/2020	Ezekiel Perez	Correspondence with opposing counsel regarding motion to compel.	0.3	\$ 250.00	\$ 75.00
841	12/18/2020	Ezekiel Perez	Correspondence with W. Germany and R. Smeberg regarding motion to compel setting.	0.2	\$ 250.00	\$ 50.00
841	12/21/2020	Ezekiel Perez	Confer with J. Muller and prepare for hearing on motion to compel.	2.1	\$ 250.00	\$ 525.00
841	12/28/2020	Ezekiel Perez	Discuss trial strategy and exhibit binders.	0.3	\$ 250.00	\$ 75.00
841	12/31/2020	John Muller	Correspondence with real estate expert regarding diminution of value of property.	0.5	\$ 325.00	\$ 162.50
925	2/22/2021	John Muller	Telephone call with Trustee.	0.3	\$ 325.00	\$ 97.50
1120	5/4/2021	Ezekiel Perez	Confer with T. Cleveland regarding attorney's fees motion and response.	0.3	\$250.00	\$ 75.00
1163	6/2/2021	Ezekiel Perez	Confer regarding hearing reset; review	0.4	\$ 250.00	\$ 100.00

			correspondence from D. Castleberry; review proposed notice of hearing.			
1163	6/9/2021	John Muller	Meeting with Client.	2.2	\$ 350.00	\$ 770.00
1163	6/16/2021	John Muller	Call wit Mcleods.	1.6	\$ 350.00	\$ 560.00
1216	07/02/2021	Ezekiel Perez	Research and confer regarding settlement issues.	2.8	\$ 250.00	\$ 700.00
1216	07/19/2021	Ezekiel Perez	Confer with W. Germany.	0.2	\$ 250.00	\$ 50.00
1216	08/02/2021	Ezekiel Perez	Confer with J. Muller regarding outstanding claims.	0.2	\$ 250.00	\$ 50.00
1367	9/20/2021	John Muller	Telephone call with client	1	\$350.00	\$350.00
1442	10/26/2021	John Muller	Attend Mcleod/Worsham Conference Call.	0.5	\$350.00	\$175.00
1442	10/13/2021	John Muller	Review draft of 2004 request for documents.	1.5	\$350.00	\$525.00
1442	10/22/2021	John Muller	Confer with opposing counsel regarding ROA agreement; confer with client re: the same.	1.4	\$350.00	\$490.00
1367	9/20/2021	John Muller	Telephone call with client	1	\$350.00	\$350.00
1442	10/26/2021	John Muller	Attend Mcleod/Worsham Conference Call.	0.5	\$350.00	\$175.00
1442	10/13/2021	John Muller	Review draft of 2004 request for documents.	1.5	\$350.00	\$525.00
1442	10/22/2021	John Muller	Confer with opposing counsel regarding ROA agreement; confer with client re: the same.	1.4	\$350.00	\$490.00
1367	9/3/2021	Ezekiel Perez	Client meeting.	0.8	\$250.00	\$200.00
1442	10/20/2021	Ezekiel Perez	Confer regarding 2004 notice.	0.2	\$250.00	\$50.00
1500	11/11/2021	Ezekiel Perez	Confer regarding next steps.	0.2	\$250.00	\$50.00
1442	10/19/2021	Ezekiel Perez	Confer regarding Panola County funds;	0.6	\$250.00	\$150.00

			review client correspondence and filing.			
1500	11/9/2021	Ezekiel Perez	Confer with client; case management conference.	0.4	\$250.00	\$100.00
1442	10/25/2021	Ezekiel Perez	Confer with J. Muller regarding DMA objection to plan and ROA advisory.	0.3	\$250.00	\$75.00
1442	10/22/2021	Ezekiel Perez	Confer with opposing counsel regarding ROA agreement; confer with J. Muller regarding the same.	0.4	\$250.00	\$100.00
1367	10/1/2021	Ezekiel Perez	Confer with R. Smeberg and J. Muller regarding motion for determination of 506(b) claims.	0.9	\$250.00	\$225.00
1500	11/8/2021	Ezekiel Perez	Confer with R. Smeberg regarding objection deadlines.	0.2	\$250.00	\$50.00
1367	9/23/2021	Ezekiel Perez	Confer with R. Smeberg regarding plan amendments and Panola Registry; confer with J. Muller regarding appellate deadlines and tasking; review documents in support of objection to proof of claim.	1.4	\$250.00	\$350.00
1442	10/11/2021	Ezekiel Perez	Confer with R. Smeberg regarding proposed final draft objection; draft proposed order; confer with J. Muller regarding the same.	1.4	\$250.00	\$350.00
1367	9/3/2021	Ezekiel Perez	Client meeting.	0.8	\$250.00	\$200.00
					TOTAL:	\$35,025.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John Muller	12.4	\$325/Hour	\$ 5,470.00
Bryan Lopez	2.9	\$325/Hour	\$ 942.50
Ezekiel Perez	89.2	\$250/Hour	\$ 21,765.00
Craig O'Neil	26.7	\$250/Hour	\$ 6,675.00
Sherry Barnash	0.6	\$250/Hour	\$ 150.00
Paige Burough	0.1	\$225/Hour	\$ 22.50

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$ 35,025.00

**CORRESPONDENCE
FOR PROFESSIONAL SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
664	7/13/2020	Craig O'Neil	Send E. Perez answer to Moore's counterclaim.	0.1	\$ 250.00	\$ 25.00
664	7/30/2020	Craig O'Neil	Email and phone call with R. Smeberg requesting discovery requests and objections from resisting law firm.	0.2	\$ 250.00	\$ 50.00
664	7/31/2020	Craig O'Neil	Send Don Dennis Conference Letter regarding 2004 document request responses and objections.	0.2	\$ 250.00	\$ 50.00
699	8/12/2020	Craig O'Neil	Send J. Muller E. Perez and R. Smeberg email update on status of Agreed Order to Continue.	0.1	\$ 250.00	\$ 25.00
699	8/14/2020	Craig O'Neil	Send opposing counsel email re: their taking the lead on drafting the motion and order to extend pleading deadline.	0.1	\$ 250.00	\$ 25.00
699	8/24/2020	Craig O'Neil	Send email re: horizontal privity of estate to group.	0.3	\$ 250.00	\$ 75.00
699	8/24/2020	Craig O'Neil	Send Pigg subpoena and notice of deposition to S. Johnson (Ping's Counsel).	0.2	\$ 250.00	\$ 50.00
699	8/25/2020	Craig O'Neil	Email to opposing counsel regarding deposition dates for Moore.	0.2	\$ 250.00	\$ 50.00
699	8/26/2020	Craig O'Neil	Send Pigg deposition cancellation email to S. Johnson.	0.2	\$ 250.00	\$ 50.00
699	8/27/2020	Craig O'Neil	Response email to S. Johnson.	0.1	\$ 250.00	\$ 25.00
699	8/31/2020	Craig O'Neil	Respond to group email regarding depositions and pleading deadlines.	0.2	\$ 250.00	\$ 50.00
750	9/2/2020	Craig O'Neil	Send client email regarding availability on deposition dates.	0.1	\$ 250.00	\$ 25.00
750	9/4/2020	Craig O'Neil	Send opposing counsel Wright dates for depo and confirm Moore's dates for deposition.	0.2	\$ 250.00	\$ 50.00

750	9/12/2020	Craig O'Neil	Send fact pattern to client and R. Smeberg for review and fact check.	0.2	\$ 250.00	\$ 50.00
750	9/15/2020	Ezekiel Perez	Communication with D. Strolle's office regarding filed objection and log.	0.1	\$ 250.00	\$ 25.00
750	9/28/2020	Ezekiel Perez	Email with C Hebert regarding status of agreed order; conferred with D. Anguiano regarding the same.	0.2	\$ 250.00	\$ 50.00
800	10/13/2020	Ezekiel Perez	Email to A. Krist regarding leave to amend.	0.1	\$ 250.00	\$ 25.00
800	10/22/2020	Ezekiel Perez	Responded to client communication and review documents provided.	0.3	\$ 250.00	\$ 75.00
800	10/28/2020	Craig O'Neil	Emails with W. Germany and T. Baskill regarding Wright's answers to Oct. 14 pleadings.	0.2	\$ 250.00	\$ 50.00
800	10/30/2020	Craig O'Neil	Send conference email to opposing counsel on our Motion to Continue Debtors' Motion for Partial Summary Judgment.	0.2	\$ 250.00	\$ 50.00
830	11/12/2020	Ezekiel Perez	Multiple correspondence with T. Cleveland regarding depositions and discovery requests.	0.2	\$ 250.00	\$ 50.00
841	12/1/2020	Craig O'Neil	Send Frankie email re: DMA's response that should be forthcoming.	0.1	\$ 250.00	\$ 25.00
841	12/3/2020	Craig O'Neil	Send Replies and exhibits to E. Perez for next draft review.	0.1	\$ 250.00	\$ 25.00
841	12/21/2020	Ezekiel Perez	Communications to K. Kershner regarding TCRG production.	0.2	\$ 250.00	\$ 50.00
1120	5/3/2021	Ezekiel Perez	Review correspondence; Confer with J. Muller regarding request to abate.	0.2	\$250.00	\$ 50.00
1120	5/25/2021	Ezekiel Perez	Correspond with opposing counsel regarding hearing reset; correspond to court regarding the same.	0.5	\$250.00	\$ 125.00
1120	5/28/2021	Ezekiel Perez	Correspond with opposing counsel regarding proposed agreed order.	0.2	\$250.00	\$ 50.00

1367	8/24/2021	Ezekiel Perez	Client call; review order on sale of property; teleconference with A. Krist regarding consolidation of appeals.	1.1	\$250.00	\$275.00
1442	10/29/2021	Ezekiel Perez	Client correspondence.	0.2	\$250.00	\$50.00
1442	11/3/2021	Ezekiel Perez	Client correspondence.	0.2	\$250.00	\$50.00
1500	12/2/2021	Ezekiel Perez	Client correspondence; correspondence regarding 2004 subpoenas.	0.4	\$250.00	\$100.00
1500	11/22/2021	Ezekiel Perez	Client correspondence; draft correspondence to L. Worsham regarding KJR documents.	1.1	\$250.00	\$275.00
1367	9/1/2021	Ezekiel Perez	Client correspondence; research filed deeds; confer with B. Lopez regarding pulling deeds.	1.2	\$250.00	\$300.00
1442	10/28/2021	Ezekiel Perez	Correspond with A. Krist regarding required joint advisory; edit draft joint advisory and designations; circulated the same for review and signature; edit draft LOI.	2.1	\$250.00	\$525.00
1500	11/17/2021	Ezekiel Perez	Correspondence from L. Worsham regarding deposition availability.	0.2	\$250.00	\$50.00
1500	11/23/2021	Ezekiel Perez	Correspondence with opposing counsel regarding request for extension of time; confer with J. Muller regarding the same.	0.3	\$250.00	\$75.00
					TOTAL:	\$2950.00

Timekeeper Summary

Name	Hours	Rate	Amount
Ezekiel Perez	7.9	\$250/Hour	\$2,200.00
Craig O'Neil	3.0	\$250/Hour	\$ 750.00

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$2,950.00

**PARALEGAL AND CLERICAL
FOR PROFESSIONAL SERVICES RENDERED**

Bill ID	Date	User	Description	Qty.	Price	Total
664	7/14/2020	Denielle Anguiano	Add certificate of service to motion to quash; Confer with Z. Perez regarding proper event and file; Email to opposing counsel.	0.8	\$120.00	\$96.00
664	7/15/2020	Denielle Anguiano	Call with bankruptcy clerk regarding filed motion in Adversary. Call with Smeberg and Z. Perez regarding correction to filing. Draft proposed order and send to Z. Perez; Follow up call with Z. Perez. Final revisions to motion and order and file. Email filings to opposing counsel.	1.5	\$120.00	\$180.00
664	7/27/2020	Denielle Anguiano	Calendar all dates of Adversary status conference	0.3	\$120.00	\$36.00
664	7/28/2020	Denielle Anguiano	Review of docket; Download Motion for Summary Judgment and arrange for phone conference to discuss; Prepare for meeting between J. Muller and R. Smeberg	0.5	\$120.00	\$60.00
664	7/30/2020	Denielle Anguiano	Locate and draft of document with contents of 5/13 production; Calls with Smeberg and C. O'Neil.	0.5	\$120.00	\$60.00
699	8/5/2020	Denielle Anguiano	Calls with C. O'Neil for case law; Research dockets in relating cases to locate and download pleadings for C. O'Neil.	0.5	\$120.00	\$60.00
699	8/12/2020	Denielle Anguiano	Pull and send operating agreement to J. Muller.	0.2	\$120.00	\$24.00
699	8/18/2020	Denielle Anguiano	Prepare shell for motion for continuance for C. O'Neil.	0.7	\$120.00	\$84.00

699	8/18/2020	Denielle Anguiano	Call with C. O'Neil regarding continued hearing; Review of dockets and prepare motion for continuance shell for filing. Email to C. O'Neil regarding the same.	0.5	\$120.00	\$60.00
699	8/18/2020	Denielle Anguiano	Connect calls with George Pigg and counsel.	0.1	\$120.00	\$12.00
699	8/19/2020	Denielle Anguiano	Revisions to certificate of service and verification; confer with C. O'Neil regarding procedure.	0.4	\$120.00	\$48.00
699	8/19/2020	Denielle Anguiano	File motion for leave; email to counsel.	0.3	\$120.00	\$36.00
699	8/19/2020	Denielle Anguiano	Review of docket with C. O'Neil	0.2	\$120.00	\$24.00
699	8/20/2020	Denielle Anguiano	Minor revisions to motion for continuance and motion to expedite; file and send email to bankruptcy clerk requesting notice.	0.5	\$120.00	\$60.00
699	8/20/2020	Denielle Anguiano	Arrange for conference call with David Strolle.	0.1	\$120.00	\$12.00
699	8/20/2020	Denielle Anguiano	Prepare notice of hearing, review with Z. Perez and file. Email to counsel of the same.	0.9	\$120.00	\$108.00
699	8/24/2020	Denielle Anguiano	Confer with C. O'Neil regarding supplement; Prepare supplement to motion for continuance and send to C. O'Neil for review; Final revision and file with Court. Email to counsel on service list.	0.5	\$120.00	\$60.00
699	8/25/2020	Denielle Anguiano	Assist with preparation of continuance hearing; connect call.	0.7	\$120.00	\$84.00
699	8/25/2020	Denielle Anguiano	Email to court clerk regarding hearing	0.1	\$120.00	\$12.00
750	9/8/2020	Denielle Anguiano	Call with court clerk regarding verbiage in Doc. 54. Phone call to C. O'Neil regarding the filing of amended answers.	0.3	\$120.00	\$36.00

750	9/9/2020	Denielle Anguiano	Review amended answers and add certificate of service.	0.6	\$120.00	\$72.00
750	9/9/2020	Denielle Anguiano	Review docket and events for filing; Call with R. Smeberg regarding proper event and file.	0.3	\$120.00	\$36.00
750	9/10/2020	Denielle Anguiano	Review and compile all time for August bill. Send to R. Smeberg for submission.	1.1	\$120.00	\$132.00
750	9/10/2020	Denielle Anguiano	Research motion for expedited consideration on motion to quash; Send to Z. Perez.	0.4	\$120.00	\$48.00
750	9/14/2020	Denielle Anguiano	Notarize affidavit for Larry Wright; Scan and email to C. O'Neil.	0.2	\$120.00	\$24.00
750	9/15/2020	Craig O'Neil	Task P. Burrough with print if KrisJenn Motion for Partial Summary Judgment cases for J. Muller.	0.1	\$250.00	\$25.00
750	9/16/2020	Denielle Anguiano	Call with Court clerk regarding doc. 65; discuss with Z. Perez Strolle's need to upload order.	0.3	\$120.00	\$36.00
750	9/16/2020	Denielle Anguiano	Convert order for doc. 65 to PDF and upload through ECF.	0.1	\$120.00	\$12.00
750	9/17/2020	Frankie Payne	Scan original documents print and bates label and save in Clio.	1.6	\$120.00	\$192.00
750	9/18/2020	Frankie Payne	File client documents by name in Clio	0.4	\$120.00	\$48.00
750	9/18/2020	Craig O'Neil	Task P. Burrough with prepare of opposing counsel's Motion for Partial Summary Judgment cases for J. Muller review.	0.1	\$250.00	\$25.00
750	9/21/2020	Denielle Anguiano	Arrange for court reporter for 9/25 depositions.	0.2	\$120.00	\$24.00
750	9/21/2020	Denielle Anguiano	Phone call and email follow up to David Strolle's office regarding motion to quash hearing.	0.2	\$120.00	\$24.00

750	9/22/2020	Frankie Payne	Draft conference letter re: discovery and deposition of Moore	1	\$120.00	\$120.00
750	9/22/2020	Denielle Anguiano	Assist with preparation for hearing.	0.4	\$120.00	\$48.00
750	9/22/2020	Denielle Anguiano	Phone call to David Strolle's office to inform of attendance for hearing; email regarding the same.	0.2	\$120.00	\$24.00
750	9/23/2020	Frankie Payne	Bates Stamp and prepare documents for production	2.5	\$120.00	\$300.00
750	9/23/2020	Denielle Anguiano	Meeting regarding plan of action for discovery	0.3	\$120.00	\$36.00
750	9/23/2020	Denielle Anguiano	Confer with F. Payne regarding produced items in bankruptcy case and provide instruction on where to pull documents to bates label.	0.4	\$120.00	\$48.00
750	9/23/2020	Denielle Anguiano	Review of all client documents and prepare for possible discovery.	1.2	\$120.00	\$144.00
750	9/24/2020	Denielle Anguiano	Meeting to discuss discovery responses; call to Larry Wright to request documents.	0.4	\$120.00	\$48.00
750	9/24/2020	Frankie Payne	Bates Stamp and catalog documents for Production. Review all documents for redactions.	3.2	\$120.00	\$384.00
750	9/24/2020	Denielle Anguiano	Email to Court reporter to postpone depositions.	0.1	\$120.00	\$12.00
750	9/24/2020	Denielle Anguiano	Review of copied threads between opposing counsel and J. Muller	0.4	\$120.00	\$48.00
750	9/24/2020	Denielle Anguiano	Discuss with F. Payne previously produced discovery and provide files.	0.5	\$120.00	\$60.00
750	9/24/2020	Denielle Anguiano	Discuss requests for production with J. Muller and review files for to prepare for deposition.	1.5	\$120.00	\$180.00
750	9/25/2020	Frankie Payne	Scan and File Documents	0.3	\$120.00	\$36.00
750	9/25/2020	Denielle Anguiano	Review of docket and upload Order to Doc. 23	0.1	\$120.00	\$12.00

750	9/28/2020	Denielle Anguiano	To Copy Concierge and return to office.	12	\$0.58	\$6.96
750	9/28/2020	Denielle Anguiano	Deliver client documents to copy service to be scanned.	0.5	\$120.00	\$60.00
750	9/28/2020	Frankie Payne	Finish preparing documents for production and send.	0.5	\$120.00	\$60.00
750	9/28/2020	Denielle Anguiano	Review docket and send pleadings relating to motion to quash Motion for Summary Judgment and responses to Craig Crockett.	0.8	\$120.00	\$96.00
750	9/29/2020	Denielle Anguiano	Assist with preparation for deposition	0.4	\$120.00	\$48.00
800	9/29/2020	Denielle Anguiano	Attention to invoice discrepancy	1	\$120.00	\$120.00
750	9/30/2020	Denielle Anguiano	To Copy Concierge and return to office.	12	\$0.58	\$6.96
750	9/30/2020	Denielle Anguiano	Assist with preparation for deposition.	0.4	\$120.00	\$48.00
750	9/30/2020	Denielle Anguiano	Review documents provided by client and add to folder to potentially be produced.	1.8	\$120.00	\$216.00
750	9/30/2020	Denielle Anguiano	Run documents to copy service to be scanned.	0.5	\$120.00	\$60.00
750	9/30/2020	Frankie Payne	Prepare exhibits for deposition.	1.6	\$120.00	\$192.00
800	10/1/2020	Denielle Anguiano	Locate option agreement and send to B. Lopez.	0.3	\$120.00	\$36.00
800	10/5/2020	Frankie Payne	Fill out and sign document return acknowledgement and review documents returned to/with Mr. Larry Wright.	0.4	\$120.00	\$48.00
800	10/5/2020	Frankie Payne	Draft shell for Response to DMA Properties Inc's Motion for Partial Summary Judgement on DMA's Ownership Interest in the Bigfoot Note Payments.	0.6	\$120.00	\$72.00

800	10/5/2020	Denielle Anguiano	Notarize affidavit for Larry Wright; scan and send to C. O'Neil	0.3	\$120.00	\$36.00
800	10/6/2020	Frankie Payne	Prepare and scan document from deposition and send to court reporter.	0.5	\$20.00	\$10.00
800	10/6/2020	Denielle Anguiano	Assist F. Payne with lookup of opposing's response to Motion for Summary Judgment	0.3	\$120.00	\$36.00
800	10/6/2020	Denielle Anguiano	Notarize affidavit for L. Wright; scan and send to C. O'Neil.	0.3	\$120.00	\$36.00
800	10/6/2020	Denielle Anguiano	Briefly meet with L. Wright for Motion for Partial Summary Judgment filing.	0.2	\$120.00	\$24.00
800	10/6/2020	Denielle Anguiano	File response to Motion for Summary Judgment.	0.2	\$120.00	\$24.00
800	10/7/2020	Frankie Payne	Categorize and reorder the documents provided by client. Complete Exhibit D.	1.4	\$20.00	\$28.00
800	10/7/2020	Frankie Payne	Print requested documents from previously received emails.	2.5	\$120.00	\$300.00
800	10/7/2020	Denielle Anguiano	Draft Supplement shell; send to C. O'Neil.	0.5	\$120.00	\$60.00
800	10/7/2020	Denielle Anguiano	Review of deposition login instructions of Adam McLeod	0.2	\$120.00	\$24.00
800	10/7/2020	Denielle Anguiano	Final review of supplement; attach exhibit and file.	0.3	\$120.00	\$36.00
800	10/7/2020	Craig O'Neil	Assigning Denielle task to draft supplement to add Exhibit D to Motion for Partial Summary Judgment response to bigfoot note payments.	0.1	\$250.00	\$25.00
800	10/8/2020	Frankie Payne	Scan and save emails provided by client	0.5	\$20.00	\$10.00
800	10/8/2020	Denielle Anguiano	Pull Original and amended complaint from docket and send to William Germany.	0.2	\$120.00	\$24.00

800	10/8/2020	Denielle Anguiano	Create login with Veritext for 10/9 McCloud Deposition.	0.3	\$120.00	\$36.00
800	10/10/2020	Denielle Anguiano	Review and revise all September time entries. Prepare invoice.	0.6	\$120.00	\$72.00
800	10/10/2020	Denielle Anguiano	Review and revise all September time entries. split as necessary and include on final invoice.	2.3	\$120.00	\$276.00
800	10/12/2020	Denielle Anguiano	Review of docket and pull Reply Response and Motion for Partial Summary Judgment for C. O'Neil review.	0.5	\$120.00	\$60.00
800	10/12/2020	Denielle Anguiano	Draft and Motion and Order for leave to file Sur-Reply. Revise with B. Lopez and send to C. O'Neil for review.	1.8	\$120.00	\$216.00
800	10/12/2020	Denielle Anguiano	Incorporate revisions for sur-reply and send to C. O'Neil for review.	0.5	\$120.00	\$60.00
800	10/12/2020	Denielle Anguiano	File docs. 94 & 95; email to court clerk in inform for 10/13 hearing.	0.5	\$120.00	\$60.00
800	10/13/2020	Frankie Payne	Organize analyze and prepare documents for our production to opposing party	3.8	\$20.00	\$76.00
800	10/13/2020	Denielle Anguiano	Pull requested exhibits to Motion for Summary Judgment and send to J. Muller.	0.2	\$120.00	\$24.00
800	10/13/2020	Denielle Anguiano	Assist with preparation for hearing.	0.5	\$120.00	\$60.00
800	10/14/2020	Frankie Payne	Review all documents (produced and not produced) sort for privilege and create a production log that corresponds to bates labeling.	4.9	\$120.00	\$588.00
800	10/14/2020	Denielle Anguiano	Review with minor revisions and file motion for leave to amend complaint.	0.8	\$120.00	\$96.00
800	10/15/2020	Frankie Payne	Analyze and organize documents for production.	5.8	\$120.00	\$696.00

			Create an index and production log			
800	10/15/2020	Denielle Anguiano	Pull 10/14 filings and send to C. O'Neil for review.	0.2	\$120.00	\$24.00
800	10/16/2020	Frankie Payne	Begin work on trial binder. Identify key players sort events chronologically.	2.6	\$20.00	\$52.00
800	10/16/2020	Frankie Payne	Analysis and organization of documents for production; index and production log created. finalize for review with client.	4.2	\$120.00	\$504.00
800	10/19/2020	Frankie Payne	Research responses for production and create a matrix to ensure all documents are responsive.	7.6	\$120.00	\$912.00
800	10/20/2020	Frankie Payne	Create Matrix for team review to determine completeness of document production.	1.7	\$20.00	\$34.00
800	10/20/2020	Frankie Payne	Verify each individual document provided by client to ensure accurate name date and indicate what Requests for Production it responds to.	4.1	\$120.00	\$492.00
800	10/20/2020	Frankie Payne	Bates stamp all documents in preparation for production	0.5	\$120.00	\$60.00
800	10/20/2020	Denielle Anguiano	Draft order on motion to compel; Send to Z. Perez for review.	0.5	\$120.00	\$60.00
800	10/20/2020	Denielle Anguiano	Split exhibits on motion to compel and file.	0.5	\$120.00	\$60.00
800	10/20/2020	Denielle Anguiano	Prepare shell responses to discovery requests for KrisJenn Ranch LLC KrisJenn Ranch LLC Series Pipeline Row and KrisJenn Ranch Series Uvalde Ranch.	2	\$120.00	\$240.00
800	10/21/2020	Frankie Payne	Meet with Client to confirm documents for Production and analyze for privilege.	0.8	\$120.00	\$96.00

800	10/21/2020	Frankie Payne	Organize and identify documents that are responsive to Requests for Productions from OC.	3.2	\$120.00	\$384.00
800	10/22/2020	Denielle Anguiano	Create attorney contacts within Clio for the purposes of sharing discovery responses.	0.4	\$120.00	\$48.00
800	10/22/2020	Frankie Payne	Process emails received today review analyze and prepare for production.	4.5	\$120.00	\$540.00
800	10/22/2020	Frankie Payne	Process text messages received today review analyze and prepare for production.	1.1	\$120.00	\$132.00
800	10/22/2020	Frankie Payne	Draft Responses to Requests for Productions to OC finalize production file and send.	5.2	\$120.00	\$624.00
800	10/22/2020	Denielle Anguiano	obtain credentials with Veritext to view and download Larry Wright transcript.	0.3	\$120.00	\$36.00
800	10/23/2020	Frankie Payne	Draft and send deposition re notices on Moore SCMED and DMA.	1.8	\$120.00	\$216.00
800	10/23/2020	Frankie Payne	Verify all documents produced in Drop Box are accounted for and all redactions are accurate. Correct all the links on the production chart and update privilege log.	2.1	\$120.00	\$252.00
800	10/23/2020	Frankie Payne	Meet with Client to retrieve emails and analyze to begin supplemental production.	1	\$120.00	\$120.00
800	10/26/2020	Denielle Anguiano	Final revisions to motion and order to expedite hearing; file with Court and email to clerk requesting dates.	1	\$120.00	\$120.00
800	10/26/2020	Frankie Payne	Draft letter and prepare USB for Requests for Production responses to Mr. Moore. Obtain the 2nd volume of deposition transcripts for Larry Wright.	1.6	\$120.00	\$192.00

800	10/26/2020	Frankie Payne	Organize analyze and verify trial binder is complete.	1.5	\$120.00	\$180.00
800	10/26/2020	Frankie Payne	Analyze documents from DMA production and begin to chart.	0.8	\$120.00	\$96.00
800	10/26/2020	Denielle Anguiano	Notarize Affidavit for Larry Wright	0.5	\$120.00	\$60.00
800	10/26/2020	Denielle Anguiano	Extract Motion for Summary Judgment exhibits into separate files for filing.	0.5	\$120.00	\$60.00
800	10/26/2020	Denielle Anguiano	Final revisions to Motion for Partial Summary Judgment and corresponding orders; convert to PDF and file.	1.2	\$120.00	\$144.00
800	10/27/2020	Denielle Anguiano	Draft file notice of expedited hearing.	0.8	\$120.00	\$96.00
800	10/27/2020	Denielle Anguiano	Confer with C. O'Neil regarding filed counterclaims; pull from docket and send to C. O'Neil for review.	0.4	\$120.00	\$48.00
800	10/27/2020	Frankie Payne	Analyze and split Requests for Production docs received from DMA	2.9	\$120.00	\$348.00
800	10/27/2020	Frankie Payne	Print and tab a deposition binder for Larry Wright Deposition.	0.8	\$120.00	\$96.00
800	10/27/2020	Denielle Anguiano	Review of docket and pull requested pleadings and to C. O'Neil	0.2	\$120.00	\$24.00
800	10/28/2020	Frankie Payne	Create a power-point/Prezi presentation that identifies all of the main transactions of the case.	4.9	\$120.00	\$588.00
800	10/28/2020	Denielle Anguiano	Email to court deputy regarding setting of Motion for Partial Summary Judgment	0.2	\$120.00	\$24.00
800	10/28/2020	Denielle Anguiano	Prepare motion and order to expedite hearing; send to C. O'Neil for review.	1	\$120.00	\$120.00
800	10/28/2020	Denielle Anguiano	Convert to PDF and file Second Amended Answers to Counterclaims.	0.4	\$120.00	\$48.00

800	10/29/2020	Denielle Anguiano	Draft motion and order for continence of Motion for Partial Summary Judgment; send to Z. Perez and C. O'Neil for review.	1	\$120.00	\$120.00
800	10/29/2020	Denielle Anguiano	Review and convert to PDF Motion to expedite; file with Court.	0.3	\$120.00	\$36.00
800	10/30/2020	Frankie Payne	Document production presentation design.	3.5	\$120.00	\$420.00
800	10/30/2020	Frankie Payne	Bates stamp supplemental Requests for Production	0.8	\$120.00	\$96.00
830	11/2/2020	Frankie Payne	Prepare exhibits for hearing	0.9	\$120.00	\$108.00
830	11/2/2020	Frankie Payne	Draft Notice of Expedited Hearing.	0.8	\$120.00	\$96.00
830	11/2/2020	Denielle Anguiano	Edit and file Notice of Expedited Hearing.	0.2	\$120.00	\$24.00
830	11/2/2020	Denielle Anguiano	Draft and edit Amended Complaint.	0.3	\$120.00	\$36.00
830	11/3/2020	Frankie Payne	Review and index documents produced by Counter-Plaintiffs.	1.3	\$120.00	\$156.00
830	11/3/2020	Denielle Anguiano	Review client correspondence.	0.2	\$120.00	\$24.00
830	11/4/2020	Frankie Payne	Review calendar entries and ensure they match the upcoming deadlines.	0.8	\$120.00	\$96.00
830	11/5/2020	Frankie Payne	Present power point to client for review notarize errata print documents for meeting.	1.3	\$120.00	\$156.00
830	11/5/2020	Sherry Barnash	Update case scheduling deadlines.	0.5	\$250.00	\$125.00
830	11/9/2020	Frankie Payne	Review and analyze documents produced by DMA in response to requests for production.	4.4	\$120.00	\$528.00
830	11/10/2020	Frankie Payne	Review documents produce by DMA and Moore; Identify potential trial exhibits.	4	\$120.00	\$480.00

830	11/11/2020	Frankie Payne	Meeting with Larry Wright to identify relevant emails. Continue review on identifying company documents that are relevant. Begin printing and organizing documents chronologically in preparation of exhibits.	7.1	\$120.00	\$852.00
830	11/12/2020	Frankie Payne	Prepare exhibit binders.	3.7	\$120.00	\$444.00
830	11/13/2020	Frankie Payne	Create exhibit binders.	3.7	\$120.00	\$444.00
830	11/13/2020	Frankie Payne	Continue to work on trial exhibits and update timeline with documents identified in production meeting earlier this week.	1.3	\$120.00	\$156.00
830	11/16/2020	Frankie Payne	Download documents from Pacer and save to file.	0.8	\$120.00	\$96.00
830	11/18/2020	Frankie Payne	Draft new Deposition Notices for SCMED DMA and Moore.	0.7	\$120.00	\$84.00
830	11/25/2020	Sherry Barnash	Update case task list and deadlines.	0.3	\$250.00	\$75.00
830	11/30/2020	Frankie Payne	Notarize all documents with Mr. Wright. Scan and send copies.	0.7	\$120.00	\$84.00
841	12/1/2020	Frankie Payne	Re: DKT 141 KrisJenn Adversary	0.1	\$120.00	\$12.00
841	12/1/2020	Frankie Payne	Prepare appropriate notarized Fed Ex Documents to send to Kuhlmann	1	\$120.00	\$120.00
841	12/1/2020	Frankie Payne	Confirm mediator for December 8 call Wade Shelton.	0.4	\$120.00	\$48.00
841	12/3/2020	Frankie Payne	Contact the court reporter and finalize details for upcoming deposition. Contact OC for deponent's contact information.	1.2	\$120.00	\$144.00
841	12/3/2020	Frankie Payne	Print every document identified for upcoming deposition. Organize	7	\$120.00	\$840.00

			chronologically and prepare as exhibits.			
841	12/3/2020	Frankie Payne	Create final Portfolio USB and all other exhibits for Moore Deposition	3.2	\$120.00	\$384.00
841	12/4/2020	Frankie Payne	Create physical binders of all 75 exhibits and include document list. Separate into three separate binders for reference guide during deposition.	2.9	\$120.00	\$348.00
841	12/4/2020	Frankie Payne	Prepare documents for Mondays Hearing. Label and organize for review. Download all newly filed docs with file stamps.	2.5	\$120.00	\$300.00
841	12/4/2020	Frankie Payne	File Debtor's Reponses with the court.	1.1	\$120.00	\$132.00
841	12/7/2020	Frankie Payne	Complete trial binders; 2015-2016/2017/2018 1of2/2018 2of2/2019 and 2020.	3.5	\$120.00	\$420.00
841	12/7/2020	Frankie Payne	Finalize mediation requirements via email. Contact Court Reporter to schedule deposition on Dec. 16th.	1	\$120.00	\$120.00
841	12/8/2020	Frankie Payne	Mediation meeting setup. with Shelton.	2.1	\$120.00	\$252.00
841	12/8/2020	Frankie Payne	Prepare docs for upcoming deposition.	2	\$120.00	\$240.00
841	12/15/2020	Frankie Payne	Add Longbranch discovery responses and recently received documents to deposition binders.	2.5	\$120.00	\$300.00
841	12/16/2020	Frankie Payne	Organize the electronic files for the deposition of Darin Borders. Set up and participate in deposition. Draft proposed order for Motion to Compel for review. Organize and send final exhibits to Court Reporter.	8.3	\$120.00	\$996.00

841	12/17/2020	Frankie Payne	Draft order for motion to compel and organize documents for attorney review.	6.8	\$120.00	\$816.00
841	12/18/2020	Frankie Payne	Locate a process server to serve the TCRG subpoenas send all required documentation.	0.7	\$120.00	\$84.00
841	12/21/2020	Frankie Payne	Prepare Trial Binders	4.5	\$120.00	\$540.00
841	12/21/2020	Frankie Payne	Meeting for trial strategy	0.8	\$120.00	\$96.00
841	12/21/2020	Frankie Payne	Review Borders deposition transcript and prepare exhibits for upcoming hearing.	1.5	\$120.00	\$180.00
841	12/22/2020	Frankie Payne	Binders dated 2012-2018 organized chronologically with matching digital files.	6.5	\$120.00	\$780.00
841	12/22/2020	Frankie Payne	Send all Borders depo exhibits to Davidson Reporting for finalization of transcripts.	0.4	\$120.00	\$48.00
841	12/28/2020	Frankie Payne	Finalize exhibit binders create table of contents and digital files of every document in order.	4.5	\$120.00	\$540.00
841	12/31/2020	Frankie Payne	Timeline and Document preparation for upcoming trial	4.6	\$120.00	\$552.00
925	1/1/2021	Frankie Payne	Set up and attend the opening statements of the trial.	2.5	\$120.00	\$300.00
925	1/2/2021	Frankie Payne	Complete document identification and begin preparing exhibits.	6.1	\$120.00	\$732.00
925	1/3/2021	Frankie Payne	Label Exhibits and create folder. Draft index to be filed with the court.	5.3	\$120.00	\$636.00
925	1/4/2021	Frankie Payne	Print and organize TCRG emails chronologically for preparation of filing exhibit list.	1.1	\$120.00	\$132.00
925	1/4/2021	Frankie Payne	Contact the court to identify the appropriate steps for the exhibits amending the exhibits and the order.	0.7	\$120.00	\$84.00

925	1/4/2021	Frankie Payne	Prepare notice of deposition of Moore.	0.7	\$120.00	\$84.00
925	1/5/2021	Frankie Payne	Search production from Moore to ensure completeness. Complete Wright Exhibit Binders 1-4. Make arrangements with court reporter for Wednesday's Deposition.	7.2	\$120.00	\$864.00
925	1/6/2021	Frankie Payne	Make additional additions to the Exhibit Binders and finalize the list to send for production. Create a privilege log. Work with Veritext to get links for McLeod depositions in preparation for upcoming trial.	6.1	\$120.00	\$732.00
925	1/8/2021	Frankie Payne	Meet with the District Clerk's office to deliver exhibits. Provide final digital copies of exhibits to all required parties per the FRCP rules. Complete the PPTX exhibit.	7.7	\$120.00	\$924.00
925	1/9/2021	Frankie Payne	Prepare rebuttal exhibits create additional binders of Longbranch, Frank Daniel Moore and DMA's exhibits Create a trial USB for use in the hearing.	6.5	\$120.00	\$780.00
925	1/10/2021	Frankie Payne	Find relevant excerpts from emails and other pertinent documents and highlight in preparation of trial.	6.1	\$120.00	\$732.00
925	1/11/2021	Frankie Payne	Participate in Opening Statements. Finish highlighting exhibits	4	\$120.00	\$480.00
925	1/11/2021	Frankie Payne	Communicate with witnesses and ensure they are able to connect to WebEx for trial.	1	\$120.00	\$120.00
925	1/12/2021	Frankie Payne	Communicate with District clerk to submit additional exhibits.	0.8	\$120.00	\$96.00
925	1/13/2021	Frankie Payne	Find documents for trial and email as requested.	1.5	\$120.00	\$180.00

925	1/15/2021	Frankie Payne	Highlight and prepare Larry Wright's Deposition Designations. Send to Mr. Perez for trial.	1	\$120.00	\$120.00
925	2/11/2021	Frankie Payne	Retrieve documents and set up for Hearing.	2.5	\$120.00	\$300.00
925	2/22/2021	Frankie Payne	Draft Krisjenn Application for fees for January.	1.5	\$120.00	\$180.00
1089	4/8/2021	Frankie Payne	Final Fee Application.	0.3	\$120.00	\$36.00
1089	4/8/2021	Frankie Payne	Email Client recent filings.	0.3	\$120.00	\$36.00
1120	5/20/2021	Tonda Sutton	Organize and archive trial binders.	1	\$120.00	\$120.00
1120	5/25/2021	Frankie Payne	Email Ms. Castleberry requesting available dates to move hearing on Attorney's Fees.	0.3	\$120.00	\$36.00
1163	6/1/2021	Frankie Payne	Correspond with Ms. Castleberry regarding the date of the hearing: Calendar the new date as 08/02/2021.	0.3	\$120.00	\$36.00
1163	6/1/2021	Frankie Payne	Draft Notice of Reset for Attorneys review	0.6	120.00	\$72.00
1163	6/8/2021	Frankie Payne	Prepare and send Fee Application and submit to the court for review.	0.7	\$120.00	\$84.00
1216	07/05/2021	Frankie Payne	Correspondence with Veritext re: cost of transcripts.	0.5	\$120.00	\$180.00
1367	8/13/2021	Frankie Payne	Prepare exhibits and Efile the Notice of Appeal.	0.5	\$120.00	\$60.00
1367	8/19/2021	Frankie Payne	Follow-up with Ms. Castleberry re: the proper procedure for filing an amended appeal.	0.3	\$120.00	\$36.00
1367	8/26/2021	Frankie Payne	Designations	3.8	\$120.00	\$456.00
1367	8/26/2021	Frankie Payne	Order transcripts, receive quote and email client for approval. Finalize details with the Court Reporter.	0.8	\$120.00	\$96.00
1367	8/19/2021	Frankie Payne	Contact the D. Castleberry to verify steps	0.3	\$120.00	\$36.00

			to file and amended appeal.			
1442	10/12/2021	Frankie Payne	Final edits and exhibit preparation and file Objection with the Court.	1.8	\$120.00	\$216.00
1442	10/1/2021	Frankie Payne	Edit Dismissal Agreement for Attorney review.	0.8	\$120.00	\$96.00
1442	10/1/2021	Frankie Payne	Correspondence with client regarding the dismissal agreement.	0.3	\$120.00	\$36.00
1442	10/20/2021	Frankie Payne	Email L. Worsham regarding the 2004 rule and subpoena.	0.4	\$120.00	\$48.00
1500	11/19/2021	Frankie Payne	Finalize and file the Rule 2004 document.	0.4	\$120.00	\$48.00
1500	11/23/2021	Frankie Payne	Draft Krisjenn appeal according to the Court rules for attorney review.	1.8	\$120.00	\$216.00
1500	11/24/2021	Frankie Payne	Update deposition notices for McLeod Oil.	1.5	\$120.00	\$180.00
1500	11/5/2021	Frankie Payne	Convert and finalize subpoenas and Rule 2004 for Mcleod Oil, and send to opposing counsel.	0.7	\$120.00	\$84.00
1367	8/13/2021	Frankie Payne	Prepare exhibits and Efile the Notice of Appeal.	0.5	\$120.00	\$60.00
1367	8/19/2021	Frankie Payne	Follow-up with Ms. Castleberry re: the proper procedure for filing an amended appeal.	0.3	\$120.00	\$36.00
1367	8/26/2021	Frankie Payne	Designations	3.8	\$120.00	\$456.00
1367	8/26/2021	Frankie Payne	Order transcripts, receive quote and email client for approval. Finalize details with the Court Reporter.	0.8	\$120.00	\$96.00
1367	8/19/2021	Frankie Payne	Contact the D. Castleberry to verify steps to file and amended appeal.	0.3	\$120.00	\$36.00
1442	10/12/2021	Frankie Payne	Final edits and exhibit preparation and file Objection with the Court.	1.8	\$120.00	\$216.00
1442	10/1/2021	Frankie Payne	Edit Dismissal Agreement for Attorney review.	0.8	\$120.00	\$96.00

1442	10/1/2021	Frankie Payne	Correspondence with client regarding the dismissal agreement.	0.3	\$120.00	\$36.00
1442	10/20/2021	Frankie Payne	Email L. Worsham regarding the 2004 rule and subpoena.	0.4	\$120.00	\$48.00
1500	11/19/2021	Frankie Payne	Finalize and file the Rule 2004 document.	0.4	\$120.00	\$48.00
1500	11/23/2021	Frankie Payne	Draft Krisjenn appeal according to the Court rules for attorney review.	1.8	\$120.00	\$216.00
1500	11/24/2021	Frankie Payne	Update deposition notices for McLeod Oil.	1.5	\$120.00	\$180.00
1367	8/6/2021	Tonda Sutton	Reviewing and analyzing invoices. Revise Fee Application.	2	\$120.00	\$240.00
1367	8/20/2021	Tonda Sutton	Revise First Amended Notice of Appeal. File with the Court	0.5	\$120.00	\$60.00
1367	8/26/2021	Tonda Sutton	Telephone call with Toni at Exceptional Reporting.	0.2	\$120.00	\$24.00
1367	9/21/2021	Tonda Sutton	Confer with attorney, Mrs. Barnash re: our Statement of Issues.	0.2	\$120.00	\$24.00
1367	9/22/2021	Tonda Sutton	Meeting with client and Paul Randles.	1	\$120.00	\$120.00
1367	9/23/2021	Tonda Sutton	Telephone call with Breanna at the United States District Court for the Western District of Texas.	0.2	\$120.00	\$24.00
1367	9/27/2021	Tonda Sutton	Meet with attorney, Mr. Perez re: Federal Rules of Civil Procedure and Bankruptcy Rules of Civil Procedure. Shell Appellant's Brief.	1	\$120.00	\$120.00
1367	10/7/2021	Tonda Sutton	Revise Objections to McCleod's Proof of Claim.	0.8	\$120.00	\$96.00
1442	10/12/2021	Tonda Sutton	Revising Objection to McLeod claims.	0.3	\$120.00	\$36.00
1500	11/22/2021	Tonda Sutton	Meet with J. Muller regarding scheduling depositions.	0.3	\$120.00	\$36.00
1500	11/23/2021	Tonda Sutton	Draft Subpoenas for Adam McLeod and corporate rep for McLeod	1	\$120.00	\$120.00

			Oil. Draft letters to W. Kuhlmann and T. Cleveland requesting available dates for depositions.			
1500	11/23/2021	Tonda Sutton	Revise subpoenas.	0.3	\$120.00	\$36.00
1500	11/29/2021	Tonda Sutton	Collecting documents for brief. Typing points to be used in brief.	1	\$120.00	\$120.00
1500	11/29/2021	Tonda Sutton	Review 2004 Subpoenas for Adam McLeod and McLeod Oil.	0.4	\$120.00	\$48.00
1500	11/29/2021	Tonda Sutton	Draft 2004 Subpoena to William Kuhlmann, Jr. and Darrin Borders.	0.5	\$120.00	\$60.00
1500	11/29/2021	Tonda Sutton	Draft 2004 Subpoena for John McLeod.	0.2	\$120.00	\$24.00
1500	11/29/2021	Tonda Sutton	Revise Subpoenas for Adam McLeod, John McLeod, and McLeod Oil. Revise Response to Motion for Extension of Time.	0.7	\$120.00	\$84.00
1500	11/30/2021	Tonda Sutton	Draft production subpoena for William Kuhlman. Revise Exhibit A to Subpoena. Correspond with Z. Perez re: production requests for Darrin Borders.	1	\$120.00	\$120.00
1500	12/1/2021	Tonda Sutton	Meet with Z. Perez.	0.6	\$120.00	\$72.00
1500	12/1/2021	Tonda Sutton	Draft 2004 Subpoena for Production to Darin Borders. Draft Exhibit A to Borders' Subpoena. Draft 2004 Subpoena for Production to Albert, Neely & Kuhlmann. Draft Exhibit A to Subpoena. Revise all exhibits.	2	\$120.00	\$240.00
1500	12/1/2021	Tonda Sutton	Draft 2004 Subpoena for Production to Longbranch Energy. Draft Exhibit A to Subpoena. Revise letters to Mr. Cleveland and Mr. Kuhlmann.	0.6	\$120.00	\$72.00

1367	8/6/2021	Tonda Sutton	Reviewing and analyzing invoices. Revise Fee Application.	2	\$120.00	\$240.00
1367	8/20/2021	Tonda Sutton	Revise First Amended Notice of Appeal. File with the Court	0.5	\$120.00	\$60.00
1367	8/26/2021	Tonda Sutton	Telephone call with Toni at Exceptional Reporting.	0.2	\$120.00	\$24.00
1367	9/21/2021	Tonda Sutton	Confer with attorney, Mrs. Barnash re: our Statement of Issues.	0.2	\$120.00	\$24.00
						Total: \$40902.92

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Sherry Barnash	0.8	\$250/Hour	\$ 200.00
Frankie Payne	266	\$120/Hour	\$ 32,358.00
Tonda Sutton	22	\$120/Hour	\$ 2,640.00
Denielle Anguiano	75.1	\$120/Hour	\$ 5,704.92

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$40,902.92

EXPENSES
FOR ADMINISTRATIVE SERVICES RENDERED

Bill ID	Date	User	Description	Qty.	Price	Total
800	10/26/2020	Expense	Milage to notarize affidavit for Larry Wright.	4	\$0.58	\$2.32
925	1/13/2021	Expense	Davidson Reporting Inv. 20 DD 625 Original excerpt of Darin Borders on 12/16/2020.	1	\$ 260.00	\$ 260.00
925	1/13/2021	Expense	Deposition of Darin Borders	1	\$ 1,836.12	\$ 1,836.12
925	1/13/2021	Expense	Davidson Reporting Invoice 20NM-628	1	\$ 2,777.00	\$ 2,777.00
750	9/28/2020	Expense	Copy Concierge - Scan client documents	1	\$ 135.33	\$ 135.33
800	10/1/2020	Expense	Copy Concierge - Scan client documents	1	\$ 138.31	\$ 138.31
841	12/2/2020	Expense	FedEx to Kuhlmann 12/01/2020	1	\$42.15	\$ 42.15
925	1/18/2021	Expense	Service to Crockett and TCRG	1	\$ 280.00	\$ 280.00
1010	3/8/2021	Expense	Veritext Invoice 4650829	1	\$ 554.58	\$ 554.58
925	1/1/2021	Expense	Shelton & Valadez Mediation	1	\$ 1,200.00	\$ 1,200.00
925	2/1/2021	Expense	Davidson Reporting Inc Deposition of Frank Daniel Moore 01/06/2021	1	\$ 1,298.75	\$ 1,298.75
1010	3/8/2021	Expense	Veritext Invoice 4601159	1	\$ 1,505.01	\$ 1,505.01
925	1/1/2021	Expense	Copy Concierge Binders for Exhibits.	1	\$ 2,712.83	\$ 2,712.83
841	12/22/2020	Expense	Tiwari PLLC	1	\$ 4,725.00	\$ 4,725.00
1367	9/07/2021	Expense	PGR Business Advisors	1	\$ 374.17	\$ 374.17
1500	10/04/2021	Expense	PGR Business Advisors	1	\$ 332.50	\$ 332.50
						\$18,174.07

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL: \$18,174.07

FINAL BILLING SUMMARY

TOTAL FEES:	\$ 371,284.50
TOTAL PAYMENTS:	\$ 178,014.05
TOTAL CREDIT:	\$ 25,000.00
TOTAL BALANCE NOW DUE:	\$ 168,270.45

SERVICE LIST

DEBTOR

KrisJenn Ranch, LLC
410 Spyglass Rd
Mc Queeney, TX 78123-
3418

GOVERNMENT

ENTITIES

Office of the UST
615 E Houston, Room 533
PO Box 1539
San Antonio, TX 78295-
1539

U.S. Attorney
Attn: Bkcy Division
601 NW Loop 410, Suite
600
San Antonio, Texas 78216

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026
AUS Austin, TX 78701

Texas Comptroller of
Public Account
Attn: Bankruptcy
P.O. Box 149359
Austin, TX 78714-9359

Angelina County Tax
Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Nacogdoches County Tax
Assessor-Collector
101 West Main Street
Nacogdoches, Texas
75961

Rusk County
202 N Main St,
Henderson, Texas 75652

Shelby County, Tax
Collector
200 St. Augustine St.
Center, Texas 75935

Tenaha ISD Tax Assessor-
Collector
138 College St
Tenaha, TX 75974-5612

Uvalde Tax Assessor
Courthouse Plaza, Box 8
Uvalde, Texas 78801

NOTICE PARTIES

METTAUER LAW FIRM
c/o April Prince
403 Nacogdoches St Ste 1
Center, TX 75935-3810

Albert, Neely & Kuhlmann
1600 Oil & Gas Building
309 W 7th St
Fort Worth, TX 76102-
6900

Laura L. Worsham
JONES, ALLEN &
FUQUAY, LLP
8828 Greenville Ave.
Dallas, Texas 75243

Craig Crockett
CRAIG M. CROCKETT,
PC 5201 Camp Bowie
Blvd. #200
Fort Worth, Texas 76107

Christopher S. Johns
JOHNS & COUNSEL
PLLC
14101 Highway 290 West,
Ste. 400A
Austin, Texas 78737

Timothy Cleveland
CLEVELAND|
TERRAZAS PLLC
4611 Bee Cave Road,
Ste. 306B
Austin, Texas 78746

Andrew R. Seger
KEY TERRELL &
SEGER
4825 50th Street, Ste. A
Lubbock, Texas 79414

**SECURED
CREDITORS**

McLeod Oil, LLC
c/o John W. McLeod, Jr.
700 N Wildwood Dr
Irving, TX 75061-8832

**UNSECURED
CREDITORS**

Bigfoot Energy Services
312 W Sabine St
Carthage, TX 75633-2519
C&W Fuels, Inc.
Po Box 40
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza
755 E Mulberry Ave Ste.
500
San Antonio, TX 78212-
3135

Granstaff Gaedke &
Edgmon
5535 Fredericksburg Rd
Ste 110
San Antonio, TX 78229-
3553

Hopper's Soft Water
Service
120 W Frio St
Uvalde, TX 78801-3602

Larry Wright
410 Spyglass Rd
Mc Queeney, TX 78123-
3418

Medina Electric
2308 18th St. Po Box 370
Hondo, TX 78861-0370

Medina's Pest Control
1490 S Homestead Rd
Uvalde, TX 78801-7625

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Uvalco Supply
2521 E Main St
Uvalde, TX 78801-4940

Longbranch Energy
c/o DUKE BANISTER
RICHMOND
Po Box 175
Fulshear, TX 77441-0175

DMA Properties, Inc.
896 Walnut Street at US
123 BYP
Seneca, SC 29678